Imperium Terminal Services Expansion Project

Draft Environmental Impact Statement – Volume 1

CITY OF HOQUIAM

DEPARTMENT OF ECOLOGY
State of Washington

August 2015

City of Hoquiam
609 8th Street
Hoquiam, WA 98550

Washington State Department of Ecology
300 Desmond Drive SE
Lacey, WA 98503

August 31, 2015

Greetings,

The City of Hoquiam and the Washington State Department of Ecology—the co-lead agencies—are pleased to present the Draft Environmental Impact Statement (Draft EIS) for the proposed expansion of the existing biodiesel production facility owned by Imperium Terminal Services (the applicant). The Imperium Terminal Services Expansion Project (the proposed action) would expand the existing biodiesel production facility to store and handle bulk liquids at Terminal 1 at the Port of Grays Harbor in Hoquiam, Washington. The bulk liquids are proposed for use on site in the biodiesel production facilities, and/or shipment to refineries on the West Coast and potentially abroad. The proposed bulk liquids include crude oil, ethanol, naphtha, gasoline, vacuum gas oil, jet fuel, no. 2 fuel oil, no. 6 fuel oil, kerosene, renewable jet fuel, renewable diesel, used cooking oil, and animal fat, in addition to currently permitted liquids, including biodiesel, petroleum diesel, vegetable oil, and methanol.

It is anticipated that the Imperium facility in Grays Harbor will be sold to the Renewable Energy Group (REG) either during the final preparation of the Draft EIS or during the public comment period. A press release announcing the sale was released on July 31, 2015 and can be viewed at http://regfuel.com/. The facility is expected to be renamed the REG Grays Harbor, LLC and this change will be made in the Final EIS. No changes to the proposed action evaluated in the Draft EIS are anticipated as a result of this sale and REG plans to continue pursuing permitting the proposed action.

The Draft EIS has been prepared in accordance with the Washington State Environmental Policy Act (SEPA) and the City of Hoquiam Municipal Code. The purpose of the Draft EIS is to evaluate the potential environmental impacts of constructing and operating the proposed action.

During the Draft EIS scoping phase, we identified many areas of concern associated with the proposed action that are subsequently addressed in the Draft EIS. The Draft EIS evaluates the impacts from construction, onsite operations, and offsite rail and vessel transport related to the proposed action, as well as the contribution of the proposed action to cumulative environmental impacts. In addition to the proposed action, the no-action alternative was also evaluated.

The following resource areas were evaluated in the Draft EIS.

- Earth
- Air
- Water
- Plants
- Animals
- Energy and Natural Resources
- Noise and Vibration
- Land and Shoreline Use
- Aesthetics, Light, and Glare
- Recreation
- Historic and Cultural Preservation
- Tribal Resources
- Public Services and Utilities
- Hazardous Materials
- Rail Traffic
- Vehicle Traffic and Safety

- Vessel Traffic
- Environmental Health and Safety
- Economics, Social Policy, and Cost-Benefit Analysis per Hoquiam Municipal Code

The Draft EIS identifies possible mitigation measures for significant adverse environmental impacts of the proposed action. In some cases, implementation of mitigation measures would reduce but not completely eliminate all significant adverse impacts. These are highlighted in the Draft EIS as *Unavoidable and Significant Adverse Impacts* and are found in the following resource areas: Earth, Noise, Tribal Resources, Vehicle Traffic and Safety, and Environmental Health and Safety.

Comments on the Draft EIS can be provided during the expanded 60-day public comment period, which lasts from August 31, 2015, through October 29, 2015. Comments can be submitted via the following methods.

By mail:

Westway and Imperium Expansion Projects EISs
c/o ICF International
710 Second Street, Suite 550
Seattle, WA 98104

Online:

Submit comments at https://public.commentworks.com/cwx/westwayimperiumcommentform

In person:

At a public meeting (orally or in writing)

- October 1, 2015, 1:00 to 9:00 p.m., at the Satsop Business Park, Flextech Building, 150 Technology Way, Elma, WA 98541
- October 8, 2015, 1:00 to 9:00 p.m., at the D&R Theatre, 205 South I Street, Aberdeen, WA 98520

Comments received on the Draft EIS during the comment period will be compiled, reviewed and considered while developing the Final EIS. The co-lead agencies anticipate that the Final EIS will be published in spring 2016, but this is subject to change. All comments and responses to comments received on the Draft EIS will be included in the Final EIS. The Final EIS will be used by local and state agencies in making permit decisions for the proposed action. Permits for construction and operation of the proposed action may be issued seven days after publication of the Final EIS. Construction of the proposed action could begin in 2016.

Questions about this Draft EIS may be directed to:

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City of Hoquiam
609 8th Street
Hoquiam, WA 98550
(360) 538-3983
bshay@cityofhoquiam.com

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Shorelands and Environmental Assistance
Washington State Department of Ecology
P.O. Box 47775
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paula.ehlers@ecy.wa.gov

The City of Hoquiam and the Washington State Department of Ecology are also serving as co-lead agencies in the development of the Draft EIS for the proposed expansion of the existing bulk liquid storage terminal owned by Westway Terminal Company LLC adjacent to the Imperium project site. Although these proposed actions are unrelated, because the proposals are similar, and because the applications were submitted at the same time, the co-lead agencies have agreed to conduct a concurrent Draft EIS public comment period.

Thank you for your interest in the Imperium Terminal Services Expansion Project environmental review process.

Sincerely,

Brian Shay, City Administrator, City of Hoquiam

Date: _____ Signature: _____

Sally Toteff, Southwest and Olympic Regional Director, Washington State Department of Ecology

Date: _____ Signature: _____

Fact Sheet

Project Title

Imperium Terminal Services Expansion Project

Description of Proposed Action and Alternatives

Imperium Terminal Services (the applicant) is proposing to expand its existing biodiesel production and transport facility by developing 10.9 acres of its 22.9-acre site[1] to handle and store bulk liquids—crude oil, ethanol, naphtha, gasoline, vacuum gas oil, jet fuel, no. 2 fuel oil, no. 6 fuel oil, kerosene, renewable jet fuel, renewable diesel, used cooking oil, and animal fat (proposed action), in addition to currently permitted liquids, including biodiesel, petroleum diesel, vegetable oil, and methanol. These liquids would either be used in the existing biodiesel production facilities or handled (unloaded and loaded) and stored for offsite transport in either the existing or proposed facilities. Proposed facilities include up to nine storage tanks, expanded rail spurs and unloading facilities, vessel loading equipment, and pipelines connecting the storage tanks with the rail unloading and vessel loading areas. It is anticipated that these bulk liquids would be transported to and from the project site primarily by rail and vessel.

Under the no-action alternative, none of the proposed facilities would be constructed and Imperium Terminal Services would continue to operate its existing facility. For the purpose of evaluating impacts, the no-action alternative includes planned infrastructure improvements that have already been funded or are expected to be permitted prior to 2017 and assumes continued future growth and development in the region over the subsequent 20 years.

Location

The proposed action would occur on the existing Imperium Terminal Services facility (project site), located between Terminals 1 and 2 of the Port of Grays Harbor (Port) in Hoquiam, Washington, just north of where the Chehalis River empties into Grays Harbor.

Proponent

Imperium Terminal Services

Co-Lead Agencies

City of Hoquiam and Washington State Department of Ecology

[1] The additional 12 acres of the project site are already developed as a biodiesel production and transport facility.

Responsible Officials

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Required Permits, Approvals, and Plans

The following permits and/or approvals would be required for the proposed action.

City

- City of Hoquiam Critical Areas Review for fish and wildlife habitat and geologically hazardous areas
- City of Hoquiam Shoreline Substantial Development Permit
- City of Hoquiam Conditional Land Use Permit
- City of Hoquiam Building Permit
- City of Hoquiam Grade and Fill Permit

- City of Hoquiam Fire Department Permit
- City of Aberdeen Utility Services Agreement
- City of Aberdeen Critical Areas Review for fish and wildlife habitat and geologically hazardous areas
- City of Aberdeen Shoreline Substantial Development Permit
- City of Aberdeen Building Permit
- City of Aberdeen Grade and Fill Permit
- City of Aberdeen Fire Department Permit

State

- Washington State Department of Ecology National Pollutant Discharge Elimination System Construction Stormwater General Permit
- Washington State Department of Ecology Resource Conservation and Recovery Act Notice of Registration Update
- Washington State Olympic Region Clean Air Agency Approval Order
- Washington State Department of Ecology National Pollutant Discharge Elimination System Industrial Stormwater Permit
- Washington State Department of Ecology Spill Prevention Plan
- Washington State Department of Ecology Spill Contingency Plan
- Washington State Department of Ecology Facility Operations Manual
- Washington State Department of Ecology Oil Handling Facility Training and Certification Report
- Washington State Department of Ecology Oil Handling Facility Safe and Effective Threshold Report
- Washington State Department of Labor and Industries – Certificate of Industrial Insurance Coverage
- Washington Department of Licensing – Fuel Tax License

Federal

- Integrated Contingency Plan (One Plan)[2] that addresses the following required plans:
  - U.S. Environmental Protection Agency Facility Response Plan
  - U.S. Environmental Protection Agency Spill Prevention Control and Countermeasure Plan
  - U.S. Coast Guard Facility Response Plan
  - U.S. Coast Guard Letter of Intent

[2] The Integrated Contingency Plan process allows a facility to comply with multiple federal planning requirements, including those required by the U.S. Environmental Protection Agency, U.S. Coast Guard, Occupational Safety and Health Administration, Office of Pipeline Safety of the Department of Transportation, and Minerals Management Services in the Department of the Interior, by consolidating them into one functional emergency response plan.

- U.S. Coast Guard Oil Spill Response Plan
- U.S. Coast Guard Facility Security Plan and Facility Security Assessment
- U.S. Coast Guard Operations Manual Update

Environmental Impact Statement Authors and Principal Contributors

This document has been prepared under the direction of the co-lead agencies. Key authors and topics are listed below.

Author	Topic(s)
ICF International 710 Second Avenue, Suite 550 Seattle, WA 98104 (206) 801-2800	Environmental impact statement and community affairs lead. Existing conditions and impact analyses for earth, air quality, water, plants, animals, energy and natural resources, noise and vibration, land use, aesthetics and light and glare, recreation, public services and utilities, historic and cultural resources, tribal resources, vehicle traffic and safety, rail traffic, vessel traffic, oil spill modeling, environmental health and safety, economics, social policy, and cost-benefit analysis. Mitigation refinement in coordination with the co-lead agencies.
Coast and Harbor Engineering 110 Main Street, Suite 103 Edmonds, WA 98020 (425) 778-6243	Tsunami risk assessment
DKS Associates 720 SW Washington Street, Suite 500 Portland, OR 97205 (503) 243-3500	Vehicle traffic modeling
WolfRAMPANT, LLC 8307 66th Avenue NW Gig Harbor, WA 98332 (206) 782-4308	Vessel traffic
VTD Rail Consulting, Tom White 6707 230th Street SW Mountlake Terrace, WA 98043 (425) 345-6337	Rail modeling, rail traffic
ECONorthwest 1218 3rd Avenue, Suite 1709 Seattle, WA 98101 (206) 388-0083	Economic modeling

Date of Draft Environmental Impact Statement Issuance

August 31, 2015

Date Draft Environmental Impact Statement Comments Are Due

October 29, 2015

You may submit your comments in the following ways.

By mail:

Westway and Imperium Terminal Services Expansion Projects EISs
c/o ICF International
710 Second Street, Suite 550
Seattle, WA 98104

Online:

Submit comments at https://public.commentworks.com/cwx/westwayimperiumcommentform

In person:

At a public meeting orally or in writing

Date and Place of Draft Environmental Impact Statement Public Meetings

October 1, 2015, 1:00 to 9:00 p.m., at the Satsop Business Park, Flextech Building, 150 Technology Way, Elma, WA 98541

October 8, 2015, 1:00 to 9:00 p.m., at the D&R Theatre, 205 South I Street, Aberdeen, WA 98520

Availability of the Draft Environmental Impact Statement

The document is posted on the Washington State Department of Ecology web site:

http://www.ecy.wa.gov/geographic/graysharbor/terminals.html. To obtain a printed copy or CD of the Draft EIS (for the cost of production), follow the instructions provided at http://www.ecy.wa.gov/services/disclosure/disclose.html.

The document is also available as a reference at:

- Washington State Department of Ecology
  300 Desmond Drive SE
  Lacey, WA 98503
- City of Hoquiam
  609 8th Street
  Hoquiam, WA 98550
- Aberdeen Timberland Library
  121 East Market Street
  Aberdeen, WA 98520-5292
- Centralia Timberland Library
  110 S Silver Street
  Centralia, WA 98531-4218
- Hoquiam Timberland Library
  420 7th Street
  Hoquiam, WA 98550-3616

- Lacey Timberland Library
  500 College Street SE
  Lacey, WA 98503-1240
- Olympia Timberland Library
  313 8th Avenue SE
  Olympia, WA 98501-1307

Next Actions

Comments on the draft environmental impact statement (Draft EIS) will be received and compiled. A final environmental impact statement (Final EIS) will be published that includes responses to comments on the Draft EIS. The Final EIS is expected to be published in spring 2016, but this date is subject to change. Seven days following publication of the Final EIS, permits for construction and operation of the project may be issued. Construction of the proposed action is planned to begin in mid-2016.

Previous Environmental Documents

Prior environmental review was conducted for the Imperium Terminal Services Expansion Project, including the following documents.

- Environmental Checklist with attachments, February 21, 2013
- Shoreline Substantial Development Permit Application, received February 13, 2013
- Conditional Land Use Permit Application, received February 13, 2013

Prior environmental review also was conducted for the original facility, Imperium Grays Harbor, including the following document.

- Environmental Checklist with attachments, June 8, 2006

When appropriate, prior environmental documents were considered in the preparation of this Draft EIS.

Location of Background Information

An electronic copy of the Draft EIS will be available online during the public comment period at http://www.ecy.wa.gov/geographic/graysharbor/imperiumterminal.html.

All materials incorporated by reference and supporting technical memoranda are available for review at the following location.

Washington State Department of Ecology
300 Desmond Drive SE
Lacey, WA 98503

Printed copies of the Draft EIS can be made available through the Washington State Department of Ecology for a fee.

Summary

Imperium Terminal Services (the applicant) is proposing to expand its existing biodiesel production and transport facility at the Port of Grays Harbor (Port) in Hoquiam, Washington.

The objective of the proposed action is to expand the existing facility to receive and load bulk liquids in addition to those already permitted. The proposed bulk liquids include crude oil, ethanol, naphtha, gasoline, vacuum gas oil, jet fuel, no. 2 fuel oil, no. 6 fuel oil, kerosene, renewable jet fuel, renewable diesel, used cooking oil, and animal fat, in addition to currently permitted liquids, including biodiesel, petroleum diesel, vegetable oil, and methanol. These liquids would be used in the existing biodiesel production facilities by the applicant or unloaded, stored in the existing or proposed facilities, and loaded for rail and vessel transport. It is anticipated that these bulk liquids would be transported to and from the project site primarily by rail and vessel. Most notably, crude oil would be delivered by train, stored, and loaded onto tank vessels at the Terminal 1 dock for shipping to refineries on the West Coast and potentially abroad.[1]

This summary provides an overview of key elements of the Draft Environmental Impact Statement (Draft EIS).

Draft EIS Process

What is the purpose of the environmental review process?

The Washington State Environmental Policy Act (SEPA) requires state and local agencies in Washington to identify and consider the environmental impacts that could result from governmental decisions including issuing permits for private projects, such as the proposed action.

Under SEPA, an EIS process is necessary if a proposed project is likely to result in significant adverse environmental impacts. An EIS provides the public and agencies with information about the effects of a proposed project and informs local and state agency permitting decisions.

What are the roles of the City of Hoquiam and the Washington State Department of Ecology?

The City of Hoquiam and the Washington State Department of Ecology (Ecology) are serving as co-lead agencies in the development of the Draft EIS and Final EIS. The City of Hoquiam and Ecology issued a SEPA Determination of Significance on April 4, 2014, for the proposed action. This determination provided notice of the intent to develop a Draft EIS and Final EIS.

[1] U.S. law currently prohibits the export of domestic oil; however, it is possible those regulations could change. If the crude oil were to could come from a Canadian source, this prohibition would not apply, and the oil could be shipped abroad.

How does the proposed action relate to the Westway Expansion Project?

The City of Hoquiam and Ecology are co-lead agencies for a SEPA review process for a similar proposal adjacent to the Imperium project site (Westway Expansion Project). Although these projects are unrelated, because the proposals are similar, the sites are located in the same community, and the applications were submitted at the same time, the co-lead agencies have agreed to conduct some parts of the EIS process jointly. Public comment periods and hearings are being conducted at the same time. Parallel and joint expanded public review allows for greater efficiency and aids in transparent community engagement.

How were the public, agencies, and tribes involved in the development of the Draft EIS?

The first step in the SEPA EIS process is called *scoping*. The co-lead agencies asked members of the public, agencies, and tribes to comment on what should be analyzed in the Draft EIS during the scoping period between April 10, 2014, and May 27, 2014. The co-lead agencies established the scope of the Draft EIS based on state and local SEPA guidance and comments received during the scoping period.

The co-leads coordinated with applicable state and local agencies with technical expertise or jurisdiction during the development of the Draft EIS. The co-leads also requested information from the Quinault Indian Nation and the Confederated Tribes of the Chehalis Reservation to identify important tribal resources and assess potential impacts of the proposed action on tribal resources.

How can the public, agencies, and tribal governments comment on the Draft EIS?

Comments on the Draft EIS will be accepted during an expanded 60-day comment period (August 31 through October 29, 2015).

By mail:
Westway and Imperium Expansion Projects EISs
c/o ICF International
710 Second Street, Suite 550
Seattle, WA 98104

Online:
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Alternatives

What is the proposed action?

The applicant is proposing to expand its existing biodiesel production and transport facility at Terminal 1 at the Port in Hoquiam, Washington. The proposed facilities would handle (unload and load) and store the proposed bulk liquids—crude oil, ethanol, naphtha, gasoline, vacuum gas oil, jet fuel, no. 2 fuel oil, no. 6 fuel oil, kerosene, renewable jet fuel, renewable diesel, used cooking oil, and animal fat—in addition to currently permitted liquids—biodiesel, petroleum diesel, vegetable oil, and methanol. The liquids would either be used for biodiesel production or handled and stored for rail and vessel transport in the existing or proposed facilities.

The biodiesel production facility and its operations are not part of the proposed action and are not part of the environmental review; however, because the existing tanks could be used for any of the products, these storage tanks are considered in the environmental review. The existing operations are considered as part of the no-action alternative. The maximum amount of liquids that could be stored on the site would increase by 30.2 million gallons (720,000 barrels) for a total of up to 48.2 million gallons (1.3 million barrels). The maximum annual throughput of bulk liquids would be 1.26 billion gallons (30 million barrels).

The proposed action involves constructing facilities on the applicant's existing industrial property at Port Terminal 1. The facilities would include up to nine bulk liquid storage tanks, each with a capacity of 3.36 million gallons (80,000 barrels), new and modified rail spurs, and pumps and pipelines connecting the storage tanks to loading and unloading areas.

The additional bulk liquids would be transported to and from the project site primarily by rail and tank vessel. Crude oil is expected to come by rail in the form of Bakken crude oil from the Intermountain Region and central United States. From Centralia, all trains would use the Puget Sound & Pacific Railroad (PS&P) rail line to reach the project site. At maximum throughput, operation of the proposed action would result in approximately two unit train trips[2] per day along the PS&P rail line (a maximum of 730 per year).

Crude oil would be transported from the project site by tank vessel (tanker or tank barge), most likely to refineries in the Puget Sound area and northern California (Richmond area). At maximum throughput, operation of the proposed action would result in an average of approximately one tank vessel trip[3] per day (a maximum of 400 per year).

Construction would occur in two phases. Phase 1, construction of all facilities except for four of the nine storage tanks, is tentatively scheduled to start in 2016 and is anticipated to last up to 18 months. If the applicant decides to construct Phase 2, the construction of four additional storage tanks is anticipated to last up to 4 months. The proposed action would become operational upon completion of construction, which is anticipated to be in 2017.

[2] A trip represents one-way travel; in other words, an inbound trip and an outbound trip are counted as two trips.
[3] A vessel trip also represents one-way travel.

What is the no-action alternative?

In addition to the proposed action, SEPA requires that the no-action alternative be evaluated to provide a comparison for the proposed action. Under the no-action alternative, none of the proposed facilities would be constructed and the applicant would continue to operate its existing facility.

Significant Areas of Concern

More than 22,200 comments expressing concerns about the proposed action were received during the scoping period. These concerns centered mostly on public safety and environmental impacts related to transportation. Rail transport concerns include increases in air pollutants, vehicle delay at and near PS&P rail line grade crossings (including emergency vehicle access and delay), and the hazards and costs related to potential oil spills, fires, or explosions. Vessel transport concerns have also focused on hazards and costs related to potential oil spills, fires, or explosions. Because oil spill response requires specialized equipment, there is also concern that local emergency responders may not be adequately trained, staffed, or equipped should an incident occur. Concerns were also raised about the potential for the proposed action to affect human health, recreational resources, natural resources, tribal resources, cultural resources, and greenhouse gas emissions. Further concerns were described about the potential for increased safety risks related to a tsunami at the project site. Additionally, commenters emphasized that the environmental review consider the cumulative impacts of implementing all three of the proposals to operate bulk liquid terminals at the Port that are currently before the co-lead agencies: the proposed action, Westway Expansion Project, and Grays Harbor Rail Terminal Expansion Project.

Environmental Impacts and Applicant Mitigation Measures

This section summarizes the environmental impacts that would likely result from construction and operation of the proposed action, measures that have been identified to mitigate those impacts, and unavoidable and significant adverse impacts that would remain after mitigation. This section also summarizes the environmental health and safety impacts related to oil spills, fires, and explosions; the impacts that could occur outside the detailed study area; and the contribution of the proposed action to cumulative impacts. Additionally, economic, social policy, and cost-benefit considerations are included as required by the Hoquiam Municipal Code.

What is the study area and what activities were analyzed?

The study area is specific to each element of the environment but in most cases includes the following components.

- Resources on and near the project site that could be affected by construction and onsite operations.
- Resources along the PS&P rail line—from Centralia, Washington, to the project site—that could be affected by rail transport.
- Resources in and around Grays Harbor that could be affected by vessel transport.

The project site is within the study area and is limited to the property leased by the applicant on which the existing and proposed facilities are and would be located. Activities at the project site would include construction (e.g., clearing the site and erecting storage tanks) and operations (e.g., rail unloading and vessel loading) that would be directly under the control of the applicant. These activities would be subject to the permit conditions that would be required by the City of Hoquiam, Ecology, and other state and local agencies.

Transport of crude oil and other bulk liquids to and from the project site by rail and vessel would occur under the responsibility of the rail and vessel operators, respectively. Although the applicant does not have control over rail and vessel transport, implementation of the proposed action would generate rail and vessel trips that could result in environmental impacts along the transportation corridors. For example, increased rail and vessel trips could lead to congestion and related traffic delays, increased noise, increased air emissions, and spills to the terrestrial or aquatic environments. The transportation corridors that would be affected by rail and vessel transport would vary depending on the commodity being transported, the source of the commodity, and the final destination for delivery. However, all rail trips generated by the proposed action would occur along the PS&P rail line between Centralia and the project site because this is the only rail line connecting the national mainline railroad system to the Port. Similarly, all vessel trips generated by the proposed action would travel through Grays Harbor along the Grays Harbor Navigation Channel between Terminal 1 and the Pacific Ocean. Therefore, these known corridors are the focus of the impact analysis related to rail and vessel transport.

What are the environmental impacts and mitigation related to construction and routine operations?

The following sections summarize the potential impacts associated with construction and routine operations on site (at the terminal) and during rail and vessel transport within the detailed study area for each element of the environment.

- Earth
- Air
- Water
- Plants
- Animals
- Energy and Natural Resources
- Noise and Vibration
- Land and Shoreline Use
- Aesthetics, Light, and Glare
- Recreation
- Historic and Cultural Preservation
- Tribal Resources
- Public Services and Utilities
- Hazardous Materials
- Rail Traffic
- Vehicle Traffic and Safety
- Vessel Traffic

Earth

Construction

Construction of the proposed action could increase erosion and soil instability from work to prepare the project site. Construction activities would expose bare soil and could result in the need to stockpile soil temporarily. The potential for increased erosion on the project site is low because the

site is relatively flat and because sandy, gravely soils have a low erosion potential. Implementation of erosion control and best management practices would further reduce the potential for erosion.

Onsite Operations

The project site is located in an area that has the potential for moderate to severe earthquakes. The extent of earthquake damage would depend on the magnitude of the event. Although the likelihood of earthquake is unchanged with or without the proposed action, the new facilities would expose additional structures and workers to potential harm. The risk of damage to the new facilities from an earthquake could increase potential impacts. Depending on the magnitude of the event, the new storage tanks could also become rupture and result in a leak of bulk liquids into the environment. The proposed action would be designed to meet local building codes and standards. Pilings would be used to stabilize the storage tank area in case of ground movement or liquefaction.

The project site is also located in an area that has the potential to be inundated by tsunami waves. The extent of damage would vary with the magnitude of the seismic event, the tidal level at the time of the earthquake, the current state of sea-level rise, and the amount of debris. Although the likelihood of tsunami is unchanged with or without the proposed action, the new facilities would expose additional structures and workers to potential harm. Implementation of a tsunami evacuation plan (Table S-1, provided at the end of this summary) would reduce these risks. Depending on the magnitude of the event, the new storage tanks could also become damaged and contribute to the tsunami debris or rupture and result in a leak of bulk liquids into the environment. The applicant would be required to study the possibility of designing the proposed facilities to reduce the impacts of a large-scale tsunami event. Mitigation would be required if it was deemed reasonable and feasible.

Rail and Vessel Transport

Although the proposed action would not result in any modifications to the PS&P rail line that would directly affect soils or geological resources, geological events could affect increased rail traffic and safety under the proposed action. Potential events that could affect the PS&P rail line include landslides, earthquakes, and other seismic events, such as liquefaction, coseismic subsidence, and tsunamis.

Although the proposed action would not result in modifications to the harbor that would directly affect soils or geological resources, vessel operations could result in the slight increased potential for shoreline erosion associated with vessel wake. Additionally, geological events, specifically earthquake-related hazards of coseismic subsidence and tsunamis, could affect increased vessel traffic and safety under the proposed action.

The potential impacts related to routine rail and vessel operations would not differ substantially from existing conditions, because there would be no ground disturbance related to rail and vessel transport and the likelihood of seismic events affecting these corridors would not change. The increased potential for incidents to result in spills, fires, or explosions during rail and vessel transport is addressed in the environmental health and safety risks section.

Air

Construction

Construction equipment and activities would emit criteria air pollutants but at amounts well below the standards established by the U.S. Environmental Protection Agency and Washington State. These activities would also emit toxic air pollutants, particularly diesel particulate matter, but not at levels that would be of concern.

Onsite Operations

The proposed action would emit criteria and toxic air pollutants from stationary sources (such as emissions from cleaning storage tanks and operating vessels) and mobile sources (such as emissions from trains and vessels idling at the project site). These emissions are projected to be below state and federal standards; however, emission of nitrogen oxides would come close to exceeding the established standard. Implementation of mitigation (Table S-1) would reduce these impacts to acceptable levels.

Rail and Vessel Transport

At maximum throughput, operation of the proposed action would increase rail traffic along the PS&P rail line by an average of two train trips per day. Increased rail traffic would approximately double the emissions of criteria pollutants currently associated with rail transport in Grays Harbor County. However, these emissions would be spread out along the 59-mile PS&P rail line, making it unlikely that state or federal standards would be exceeded at any single location.

Increased rail traffic would also increase toxic air pollutants, primarily diesel particulate matter. Exposure to high levels of diesel particulate matter has been shown to increase the risk of cancer. The most diesel particulate matter would be emitted between the Poynor Yard in Hoquiam and the project site. There are no residences, schools, hospitals, daycare centers, convalescent facilities, senior centers, parks, or recreational facilities in the potentially affected area. Elsewhere along the PS&P rail line, emissions would be spread out and would not be concentrated in any one area. Also, risk of exposure would be reduced in the future when new rail locomotives that emit less diesel particulate matter are put into service. Implementation of mitigation (Table S-1) would ensure levels of diesel particulate matter remain at acceptable levels. Cumulative impacts are discussed in the potential cumulative impacts section.

Vessels related to the proposed action would travel along the Grays Harbor Navigation Channel, which is located away from the shoreline. Emissions of criteria and toxic air pollutants (primarily diesel particulate matter) would be spread out over the length of the navigation channel. Emissions would not likely exceed state and federal standards.

Greenhouse Gases

Construction and operation of the proposed action and associated rail and vessel transport would result in the emission of greenhouse gases. These gases are described as carbon dioxide equivalents (greenhouse gas emissions are calculated in terms of the equivalent warming potential of carbon dioxide, a primary greenhouse gas). Construction activities would emit approximately 2,955 metric tons of carbon dioxide equivalent per year. Operations (including rail and vessel transport) would emit approximately 43,759 metric tons of carbon dioxide equivalent. This represents less than

0.001% of the national 2025 target and less than 0.1% of the state 2050 target to reduce greenhouse gas emissions. Total annual operational emissions including rail and vessel transport in Washington State are equivalent to that of approximately 9,200 vehicles.

The combustion of crude oil (or any of the bulk liquids) would also emit greenhouse gases. These greenhouse gas emissions are disclosed in the Draft EIS.

Water

Construction

Construction would occur within 200 feet of the shoreline of Grays Harbor and Fry Creek. No dredge or fill operations or other in-water construction work is needed for the proposed action in these waters or any other surface waters, wetlands, or floodplains. Construction is not expected to result in any permanent impacts on water resources. Temporary impacts could occur from construction activities that involve soil disturbance, equipment and material use, and storage tank hydrostatic testing. Implementation of best management practices consistent with the required permits would ensure that water quality standards are met. Construction would not affect wetlands because wetlands are not present on or within 300 feet of the project site.

Onsite Operations

Routine operation at the project site could affect Grays Harbor as the result of leaks or spills of various chemicals used for facility operations and maintenance. Additionally, operation of the bulk liquid transfer operations could result in leaks or spills of bulk liquids (e.g., crude oil) as the result of equipment failure or human error during unloading or loading activities. Other potential stormwater contaminants include vehicle residues that accumulate in parking lots and material handling areas; airborne particulates from vehicle and vessel exhaust and facility emissions that are deposited on pavement and other impervious surfaces of the facility; and residues of herbicides from areas where vegetation management (e.g., weed control in tank containment area) occurs. These chemicals could enter adjacent surface waters by transport in stormwater runoff and could degrade water quality and adversely affect both aquatic vegetation and aquatic life near the facility. These substances could also be transported to other portions of Grays Harbor. Implementation of best management practices consistent with the required permits would ensure that water quality standards are met.

Rail and Vessel Transport

Increased rail traffic could affect the quality of surface waters and groundwater along the PS&P rail line as the result of leaks and spills. Sensitive areas that could be affected by such releases include the Chehalis River Surge Plain Natural Area Preserve and the designated Critical Aquifer Recharge Area in the Black River and Scatter Creek subwatersheds in Thurston County. Most of these releases would likely be limited to minor drips and leaks. The potential for such leaks can be reduced by regularly inspecting and maintaining locomotives and rail cars and by implementing best management practices. The impacts of larger spills, fires, or explosions during rail and vessel transport are discussed separately below.

Increased vessel traffic and associated routine operation could result in water quality impacts related to ballast water discharge, propeller wash, and vessel wake.

Plants

Construction

Ground disturbance for construction would result in the loss of approximately 10.9 acres of vegetation. The areas where construction would occur do not support native plant communities and do not provide valuable habitat to animals. Construction activities could temporarily affect shoreline and aquatic vegetation near the project site. Disturbances could temporarily increase total suspended solids near the project site and result in the release of construction vehicle fluids or construction materials. Implementation of best management practices per the required water quality permits would ensure these impacts would not exceed acceptable levels.

Onsite Operations

Operation of the proposed action would not affect plants or animal habitat because the project site would be completely developed and no plants would be expected to colonize the developed site. However, the proposed action could affect plants and habitat in and around the harbor as the result of impacts on water quality associated with routine operations. Implementation of best management practices consistent with the required permits would ensure that water quality standards were met and potential impact on plants would be low.

Rail and Vessel Transport

An increase in leaks and spills of chemicals used in routine rail and vessel operations could occur due to the increased traffic and associated maintenance. Diesel fuel, oils, grease, and other petrochemicals required for operation and maintenance could either leak directly into vegetated areas along the rail bed, be carried short distances by precipitation or surface waters to more sensitive areas, or spilled into the harbor. Most of these releases would be limited to minor drips and leaks whose potential can be reduced by regularly inspecting and maintaining locomotives and rail cars and by implementing best management practices. The impacts of larger oil spills, fires, or explosions during rail and vessel transport are discussed separately below.

Increased vessel traffic could also result in a slight increase of erosion along Grays Harbor. Along the navigation channel, increased traffic could cause slight erosion of sediments and low-lying intertidal vegetation, and could uproot aquatic vegetation in shallow areas along the outer boundaries. Docked tank vessels could increase shading in the aquatic environment beneath and adjacent to existing berthing structures. Shading can change primary productivity of aquatic plants, although these impacts would be low. Vessels calling at the Terminal 1 berth could bring invasive species to Grays Harbor via ballast water. Although the vessels would be required to exchange ballast water at sea to reduce potential transport of invasive species during the loading process, risks would remain. Implementation of mitigation (Table S-1) would reduce the risk of spreading invasive species.

Animals

Construction

Construction activities could temporarily increase total suspended solids in water near the project site and result in the release of construction vehicle fluids or construction materials. Implementation of best management practices per the required water quality permits would ensure these impacts would not exceed acceptable levels that could adversely affect animals.

Noise would increase above ambient levels during construction. However, no special-status species have been recently documented in the study area. There is suitable habitat for the bald eagle, blue heron, and peregrine falcon, but it is unlikely that these species would be found near the project site. Aquatic species, including bull trout, green sturgeon, eulachon, and chum and Chinook salmon could be affected by noise from pile driving. Although occurrence of these species is limited to certain times of the year and in some cases may be rare, if any aquatic animals are present near the site during pile driving they could be affected. Noise from pile driving is not predicted to exceed the peak threshold but the accumulated noise threshold is predicted to be exceeded at Fry Creek and the Chehalis River. Implementation of mitigation (Table S-1) would reduce the potential for this impact to acceptable levels.

Onsite Operations

Operation of the proposed action would not affect animal habitat on the project site, because the project site would be completely developed and no suitable habitat for animals would be present. The proposed action could affect animals in and around the harbor because of impacts on water quality associated with small spills or leaks from routine operations or from large spills at the project site. Implementation of best management practices consistent with the required permits would ensure that water quality standards are met and the potential impact on animals would be low. The impacts of larger oil spills, fires, or explosions at the project site are discussed separately below. Additionally, the applicant would voluntarily cease vessel-loading operations of crude oil for 2 weeks each year (Table S-1) to reduce the potential for impacts on natural resources during the Grays Harbor Shorebird Festival.

Noise from onsite operations would be similar to existing conditions and would not result in substantial increases in noise that would be noticeable to animals likely to be found around the project site.

Rail and Vessel Transport

An increase in leaks and spills of petrochemicals used in routine rail and vessel operations could occur due to the increased traffic and associated maintenance. Diesel fuel, oils, grease, and other petrochemicals required for operation and maintenance could either leak directly into vegetated areas along the rail bed, be carried short distances by precipitation or surface waters to more sensitive areas, or spilled into the harbor. Most of these releases would be limited to minor drips and leaks. The potential for such leaks can be reduced by regularly inspecting and maintaining locomotives and rail cars and by implementing best management practices. The impacts of larger spills, fires, or explosions during rail and vessel transport are discussed separately below.

Wakes generated by vessels related to the proposed action could reach the shoreline and affect nearshore aquatic species, especially juvenile fish, by washing them ashore and stranding them on the shoreline. However, vessels are expected to transit during high tides, which would reduce potential impacts. Shading from docked large vessels could affect fish migration, prey capture, or predation. Increased vessel traffic related to the proposed action would generate increased underwater noise that could affect aquatic animals, especially marine mammals because they rely on sound as a means of communication for finding food and mates, and for detecting predators. The potential for these impacts would increase somewhat under the proposed action because of increased vessel trips but would generally remain low.

Increased vessel traffic would also increase the chance of vessels striking marine mammals in the navigation channel; however, the greatest potential for vessel strikes would be in the shipping lanes, which are located outside of state waters. This is because large mammals, such as whales, typically migrate and forage in deeper waters and are not likely to enter the harbor.

Vessels calling at the Terminal 1 could bring invasive species to the Grays Harbor in their ballast water that could affect aquatic life. Although the vessels would be required to exchange ballast water at sea to reduce potential transport of invasive species during the loading process, the risks would remain. Implementation of mitigation (Table S-1) would reduce the risk of invasive species spreading.

Energy and Natural Resources

Construction

The proposed action would be constructed of materials that require energy and natural resources to manufacture. Energy would also be consumed in the transport of these materials to the project site. The increase in energy consumption is anticipated to be met by existing local energy and fuel supply and natural resources. Implementation of mitigation (Table S-1) would reduce energy consumption.

Onsite Operations

Energy would be used to operate equipment at the terminal. The proposed action's energy consumption during operation would be primarily in the forms of electricity, natural gas, and fuel. The increase in energy consumption is anticipated to be met by existing local fuel supply. To reduce energy consumption, the applicant would implement energy-saving measures in project design and operation (Table S-1).

Rail and Vessel Transport

Rail traffic associated with the proposed action would consume diesel fuel. The demand for diesel under the proposed action is anticipated to be met by regional supply. Vessels would likely use marine distillate fuel. The demand for marine distillate fuel under the proposed action is anticipated to be met by regional supply.

Noise and Vibration

Construction

Construction of the proposed action would result in a temporary increase in noise and vibration near the project site. Construction noise would consist primarily of operating construction equipment, such as pile-driving equipment, backhoes, cement mixers, and excavators. The greatest noise increases would result from pile driving, which is anticipated to last approximately 2 to 3 months. However, noise and vibration levels would be low at the nearest residential areas (approximately 1,500 feet) and are not anticipated to disrupt residents or other sensitive groups surrounding the project site. Implementation of mitigation (Table S-1) to keep construction and maintenance equipment in good working order would reduce noise and vibration impacts. Additionally, because construction would only occur during daytime hours, any noise or vibration from these activities would be limited to daytime hours.

Onsite Operations

Onsite operations would generate noise and vibration from equipment use and rail and vessel loading and unloading activities. Noise and vibration levels associated with these activities would be similar to levels generated by existing operations at the project site and in the Port area. The increases in noise and vibration are not anticipated to be disruptive to residents or other sensitive groups near the project site.

Rail and Vessel Transport

At maximum throughput, operation of the proposed action would increase rail traffic along the PS&P rail line by an average of two unit train trips per day. Noise-sensitive receptors (such as residences) would be exposed more frequently to two types of train noise.

- Wayside noise: The combined effect of locomotive noise and car/wheel noise.
- Horn noise: The sound of locomotive warning horns, which are sounded in advance of grade crossings per federal safety requirements.

Trains associated with the proposed action would travel at the same speeds as existing trains, and locomotives would sound horns consistent with existing practices. Therefore, the wayside and horn noise levels associated with any individual train trip would not change substantially compared to existing conditions.

However, because the proposed action would result in more rail traffic, average noise levels along the PS&P rail line would increase. Noise monitoring determined the baseline conditions at various sites along the rail line. Generally, in areas where existing noise levels are low (particularly at night), there is a greater likelihood that increased train traffic would result in more noticeable noise. The noise increase would be most noticeable for residences located close to the PS&P rail line, particularly near grade crossings where trains are required to sound horns. The greatest noise impacts on residences would occur between Satsop and Elma, and at some residences close to the rail line in Central Park, Malone-Porter, and Centralia. Implementation of mitigation (Table S-1) to assist with the development of quiet zones in coordination with PS&P and the Federal Railroad Administration could reduce noise from train horns; however, if these measures were not implemented, noise increases from the additional train traffic would remain. Cumulative impacts are discussed in the potential cumulative impacts section.

Increased vessel traffic in Grays Harbor would not significantly increase noise levels. The nearest noise-sensitive receptors are along the shoreline (approximately 1,800 feet from the navigation channel), and impacts from vessel noise would be negligible.

Because vibration levels are primarily a function of train speed, and train traffic associated with the proposed action would not increase train speeds along the PS&P rail line, vibration impacts from rail traffic would be negligible. Vibration-sensitive receptors would experience no vibration on land from increased vessel traffic, because vessels would be traveling approximately 1,800 feet from the shoreline.

Land and Shoreline Use

Construction

Construction would occur in both the City of Hoquiam's and City of Aberdeen's Industrial Districts, where construction activities are compatible with the land and shoreline use designations of both cities' comprehensive plans and shoreline master programs. The applicant would be required to obtain all appropriate permits and/or approvals prior to construction. Therefore, impacts on land and shoreline use from construction of the proposed action are not anticipated.

Onsite Operations

Implementation of the proposed action would require land use permits from the City of Hoquiam and the City of Aberdeen, which require demonstration of consistency with the applicable policies and zoning. Operation of the proposed action at the project site would be consistent with the applicable policies, including consistency with comprehensive plans, zoning ordinances, critical areas ordinances, and shoreline master programs. The applicant would be required to obtain appropriate permits and approvals to ensure compliance with these requirements and consistency with the applicable land use and shoreline management programs and ordinances. Impacts on land and shoreline use from operation of the proposed action are not anticipated to occur.

Rail and Vessel Transport

Increased rail and vessel traffic associated with the proposed action would occur in existing transportation corridors. Rail and vessel transport in these areas is currently ongoing and the proposed increases in traffic would be consistent with applicable land use plans, policies, zoning, and regulations.

Aesthetics, Light, and Glare

Construction

The presence of construction equipment and the related increase in activities would create short-term visual changes at the project site. However, the project site is an existing industrial area and cranes and industrial operations are a common part of the visual environment. Construction would not require the use of high-intensity nighttime lighting and would not negatively affect day or nighttime public views. Glare would not be increased on the project site during construction.

Onsite Operations

Operation of the proposed action is not anticipated to result in substantial changes in views of the Port or harbor that would negatively affect any viewer groups. The most prominent features to be built on the project site would be the storage tanks. Implementation of mitigation (Table S-1) would ensure that the proposed facilities would be consistent with the existing industrial character of the Port and immediately surrounding area and would not materially change the visual character or quality of views. The changes in lighting toward the interior of the Port and away from residential areas are not anticipated to affect views from scenic routes. Although nighttime lighting would increase compared to the no-action alternative, new sources of nighttime lighting are not expected to affect any viewer groups negatively.

Rail and Vessel Transport

Although most lighting would not disturb surrounding land uses, the proposed action could increase nighttime rail and vessel transport lighting compared with the no-action alternative.

Recreation

Construction

Construction vehicles would not likely block or reduce vehicle access to the 28th Street boat launch, fishing pier, viewing tower, or nearby parks. No in-water construction or access to the project site by water is proposed; therefore, the activities would not conflict with in-water recreation near the project site. Construction activities, primarily pile driving, would result in increased noise levels that could disturb surrounding recreational uses.

Onsite Operations

Vessel loading would restrict recreational boating and fishing access to the area directly adjacent to the Terminal 1 dock. Impacts on recreational boaters would be low because boaters could access other boating and fishing areas throughout the harbor. Implementation of mitigation (Table S-1) would reduce impacts on recreational boaters. Operational noise levels would be similar to existing noise levels at the project site and would be consistent with current uses surrounding the project site. Potential impacts on animals, including fish, are described above.

Rail and Vessel Transport

Increased noise along the PS&P rail line as a result of increased rail traffic could affect recreational uses; however, the maximum level of noise associated with a single train passing by that is likely to be experienced in recreational areas would not change because all trains would continue to travel at the same speeds as existing trains and would sound horns similarly. Increased train noise could temporarily disturb surrounding recreational uses during the passage of a train. Because recreational uses already experience noise levels associated with rail operations and because noise is temporary, noise impacts from the additional rail traffic under the proposed action are considered low. Potential impacts on animals from rail and vessel transport are described above.

For the majority of the rail line, the increase in rail traffic would not result in a substantial increase in vehicle delays or blocked vehicular access that could restrict access to recreational areas. However, vehicle access to Morrison Riverfront Park, which can only be accessed through entrances to the Olympic Gateway Plaza, would be blocked more frequently and for longer durations because of train operations in Aberdeen. Implementation of mitigation (Table S-1) to address vehicle delays at this location would reduce this impact.

Because vessel traffic under the proposed action would be limited to the navigation channel, impacts on recreational uses in the harbor outside the channel are not expected. The 28th Street boat launch area is near the navigation channel and project site; however, it is expected that recreational boaters would have sufficient room to navigate safely away from the launch into the harbor and would not be substantially affected by vessels passing through the navigation channel. All other major access points for recreational boaters would be distant and not affected by vessel traffic. Recreational fishing does occur in the navigation channel, primarily in the fall. While this area would not be accessible while a vessel was making the trip to and from the project site (approximately 2 hours

one-way), recreational fishing and boating is highly seasonal, and even at the height of the season, the boat density is considered low, meaning potential conflicts are not anticipated to be frequent or to last for a substantial amount of time. Additionally, alternative fishing areas that would not be affected by vessel traffic are available. Implementation of mitigation (Table S-1) to provide advance notice of vessel transit would reduce impacts on recreational fishing.

Historic and Cultural Preservation

Construction

No significant or protected cultural resources have been found at the project site. Although unlikely, archaeological resources may be found below the ground surface during construction. Construction of the proposed facility mainly involves surface grading and driving piles, which would not require significant excavation or deep ground disturbance. Implementation of mitigation (Table S-1) to develop and implement an unanticipated discovery plan would address this impact.

Onsite Operations

Operation of the proposed action would not affect cultural resources because no cultural resources have been identified at or immediately surrounding the project site.

Rail and Vessel Transport

Increased rail traffic would not affect cultural resources because it would not involve ground-disturbing activities, increase vibration along the PS&P rail line, or alter views of historically important features of any historical resources.

Although unlikely, increased vessel traffic could slightly increase shoreline erosion, potentially affecting onshore cultural resources.

Tribal Resources

Construction

Construction of the proposed action would likely have no impact on tribal resources because no in-water work is required. No access to the project site by water is proposed; therefore, the activities would not conflict with tribal fishing resources near the project site. Construction activities, primarily pile driving, would result in increased noise levels that could disturb aquatic species, including fish, and tribal fishers near the project site.

Onsite Operations

At maximum throughput, operation of the proposed action would result in vessels loading at the Terminal 1 dock up to 200 days per year, which added to baseline vessel forecasts over the planning period would result in vessels at the Terminal 1 berth 244 days per year. This increase in vessels at Terminal 1 could reduce access to tribal fishing areas. Potential impacts on animals, including fish, are described above.

Drift gillnet fishing in Grays Harbor occurs in the area directly in front of the Terminal 1 dock that would be occupied by vessels. While a vessel is at berth, fishers cannot extend fishing nets as far and cannot access the areas nearest to the dock structure. Lighting impacts on fish behavior from

nighttime transfer operations could also affect the efficiency of drift netting. Implementation of mitigation (Table S-1) to coordinate docking schedules with fishing schedules, provide advance notice of vessel calls and movements, and work with the Quinault Indian Nation to identify other measures as appropriate could reduce these impacts. However, vessel operations of the proposed action could exclude tribal fishers from fishing areas. If mitigation measures are not feasible, the proposed action could result in unavoidable and significant adverse impacts on tribal resources as described further below.

Rail and Vessel Transport

Rail traffic along the PS&P rail line would increase by an average of two train trips per day. This increase would not significantly reduce access to Quinault Indian Nation tribal resources because there are few grade crossings between the Quinault Indian Nation reservation and Quinault fishing and access sites and substantial delays are not expected at these grade crossings. The Chehalis Tribe's access to fishing sites would not be affected because access roads to fishing sites on their reservation do not cross the PS&P rail line. Potential impacts on animals and plants from the proposed action are described above. Cumulative impacts are discussed in the potential cumulative impacts section.

Vessel traffic would increase by one vessel trip per day. Vessel traffic would not likely affect Quinault Indian Nation tribal resources outside of the navigation channel (including crab fishing in the harbor). However, vessel operations could exclude tribal fishers from a portion of their typical fishing area within the navigation channel (from approximately the Crossover Channel Reach of the navigation channel to the turning basin upstream of Terminal 2). Conflicts would be greatest during the fall salmon fishery when tribal fishers use gillnets. Vessel traffic could also reduce access to marine fisheries (including crab) in the ocean because tribal fishers may not be able to cross the bar when tank vessels are moving into or out of the navigation channel. Implementation of mitigation (Table S-1) to coordinate docking schedules with fishing schedules, provide advance notice of vessel calls and movements, and work with the Quinault Indian Nation tribal officials to identify other measures as appropriate could reduce these impacts. Vessel transport related to the proposed action could exclude tribal fishers from fishing areas. If mitigation measures are not feasible, the proposed action could result in unavoidable and significant adverse impacts on tribal resources as described below.

Public Services and Utilities

Construction

Construction of the proposed action would temporarily increase the demand for water at the project site. Construction activities would also result in a temporary increase in solid waste and hazardous waste. These services would not exceed public service or utility service provider capability.

Onsite Operations

During operations, new buildings and additional employees would modestly increase the demand for potable water on site. Routine operation of the proposed action would increase the amount of solid waste generated at the project site and could generate hazardous waste as a result of minor releases. These hazardous materials would require safe disposal and would be hauled separately from regular solid waste.

Rail and Vessel Transport

No utility or public service impacts would result from rail and vessel transport.

Hazardous Materials

Construction

Construction activities would be required to comply with applicable regulations. The project site has undergone cleanup and during follow-up sampling, pollutants were identified on the site. Construction could result in the slight risk of exposure of contaminated soils; therefore, a soil management plan would be prepared prior to construction activities. Implementation of mitigation (Table S-1) would reduce these impacts.

Onsite Operations

Although the unloading, storage, and loading of bulk liquids would be similar to existing operations, there is increased risk of exposure of people primarily workers) and the environment due to the increase in throughput and increased consequences to human health and the environment due to harmful substances. Similar to existing conditions, exposure to hazardous materials associated with routine operations would be most likely to occur during unloading and loading activities. These routine operations could result in minor releases that would be easily contained and cleaned up by trained terminal personnel. The proposed facility would be designed and operated to meet the appropriate safety standards as a designated oil facility under federal and state law. Specifically, the facilities would be designed to meet primary and secondary containment standards in the event of a spill. Additionally, the applicant would be required to update the integrated contingency plan to reduce the potential for accidental releases of crude oil or other hazardous materials. The integrated contingency plan identifies emergency notification and response protocols during site operations and vessel transfers. Similar to existing conditions, the applicant would continue to ensure that personnel training and handling and storage activities would also comply with the appropriate safety standards intended to reduce the risks of accidents and to address potential spills during operation. Potential impacts from spills are described environmental health and safety risks section.

Rail and Vessel Transport

Potential impacts elated to rail and vessel transport of hazardous materials are addressed in the environmental health and safety risks section.

Rail Traffic

Implementation of the proposed action would result in an increase of two unit train trips per day (a maximum of 730 trips per year) along the PS&P rail line. Based on the rail traffic modeling and analysis, the PS&P rail line has the capacity to accommodate up to 12 trips per day. Existing rail traffic is approximately three trips per day, so the rail line would have sufficient capacity to accommodate existing trains and trains related to the proposed action. However, rail traffic and

operations, particularly switching operations,[4] would result in increased blockages along the rail line but most substantially at intersections between East Aberdeen and the project site. The potential impacts on vehicle delay and safety are addressed in the next section.

Vehicle Traffic and Safety

Construction

Construction of the proposed action would result in more vehicles traveling to and from the project site to transport construction workers, equipment, and materials. However, these trips would represent a small increase in daily traffic in the area and would not likely affect vehicle delays and safety.

Onsite Operations

Operation of the proposed action would add vehicle trips to and from the project site, mainly from additional employees. These trips would also represent a small increase in daily traffic and would not likely affect vehicle delays and safety.

Rail and Vessel Transport

At maximum throughput, operation of the proposed action would increase rail traffic along the PS&P rail line by an average of two train trips per day. These trains would block rail crossings more frequently, which would cause increased vehicle delays and safety concerns.

Several intersections in Centralia and Aberdeen currently have long vehicle delays. These delays would continue under the no-action alternative. The increase in rail traffic to and from the proposed facilities related to the proposed action would block PS&P rail line crossings more frequently and longer than currently occurs. These delays would be greatest during rush hour traffic although in general, vehicle delay along most of the PS&P rail line would not substantially increase. This is because the existing and future vehicle traffic is relatively low along this corridor and the chance of encountering a project train at a crossing would continue to be low. However, closer to the project site, eastbound trains occupying Olympic Gateway Plaza crossings and trains being separated and moved from Poynor Yard would cause substantial increases in vehicle delay at grade crossings between East Aberdeen and the project site. For example, trains currently occupy all grade crossings in the Olympic Gateway Plaza area for up to 35 minutes about 4 times per week. Under the proposed action, this time would increase to up to 45 minutes and could happen approximately 7 more times per week. Trains currently occupy the Industrial Road crossing adjacent to the project site for up to 13 minutes. Under the proposed action, this time would increase to up to 77 minutes.

The vehicle delays would affect emergency vehicles unless alternative routes were available. Implementation of mitigation (Table S-1) could decrease vehicle delays and emergency access issues. Potential infrastructure changes in the future could also reduce impacts. If mitigation is not feasible or infrastructure changes do not occur, the proposed action would have unavoidable and

[4] Switching operations are generally related to disassembling unit trains by setting rail cars on multiple tracks, rearranging rail cars on tracks to facilitate loading or unloading, sorting rail cars by destination, delivering rail cars to an industry, picking up rail cars from an industry, or assembling unit trains from rail cars on multiple tracks.

significant adverse impacts on vehicle delays from trains blocking crossings in the Olympic Gateway Plaza and Port areas.

Vessel Traffic

Construction

Construction of the proposed action would involve no in-water work and no vessel transport, and therefore would not affect existing vessel traffic.

Onsite Operations

At maximum throughput, operation of the proposed action would result in vessels at berth at Terminal 1 up to 200 days per year, which added to baseline vessel forecasts over the planning period would result in vessels at the Terminal 1 berth 244 days per year. Factoring annual downtime, a berth is available up to 90% of the time or 328 days per year. The proposed action would not exceed berth availability. Cumulative impacts are discussed in the potential cumulative impacts section.

Increased occupancy of the Terminal 1 berth under the proposed action would reduce access to fishing areas located next to the Terminal 1 dock, which is in a prime commercial fishing area. Depending on the specific circumstances of each interaction (e.g., chance of a vessel calling during an open fishing window, distribution of the fish within the channel, number of fishers on any given day), it is difficult to predict whether increased occupancy at Terminal 1 would significantly affect any single fisher's daily catch. However, if a vessel is at berth during the fall fishery, fishers would have the option to fish longer (complete more drifts) or may choose to fish other preferred locations in Grays Harbor (such as other portions of the navigation channel, farther away from the shoreline or father upstream) although opportunities to relocate during intense fishing periods may be limited if the other areas are occupied by fishers. Implementation of mitigation (Table S-1) to coordinate docking schedules with fishing schedules, provide advance notice of vessel calls and movements, and work with the Quinault Indian Nation to identify other measures as appropriate could reduce impacts on commercial fishers.

Rail and Vessel Transport

At maximum throughput, operation of the proposed action would result in 400 tank vessel trips per year. Adding these trips to baseline forecasts of large commercial vessel trips over the analysis period, would result in 822 vessel trips per year. Considering the opportunities available for these vessels to travel through the harbor at various channel depths, the proposed action would not result in exceeding the capacity of the navigation channel. The increase in vessel traffic would increase the demand for escort tugs and pilots in Grays Harbor, but this demand could be managed with existing resources. It is not anticipated that availability of escort tugs or pilots would limit vessel operations at the Port. Cumulative impacts are discussed in the potential cumulative impacts section.

Increased vessel traffic could affect commercial fishing activities by disrupting fishing in the navigation channel, particularly from the Crossover Channel Reach of the navigation channel to the turning basin. Vessel traffic would not affect fishing outside the navigation channel (including crab fishing in the harbor). Conflicts would be greatest during the fall salmon fishery when the most fishing boats are present. Commercial fishing could be affected, but alternative fishing areas are available. Implementation of mitigation (Table S-1) would reduce these impacts further.

What are the environmental health and safety risks of oil spills, fires, and explosions?

Because it is not possible to predict the timing or magnitude of an oil spill, the Draft EIS focuses on spill scenarios. The spill scenarios include those required by law for contingency planning plus others that were relevant to the proposed action. Each spill scenario is defined by the type of activities, spill location, and the amount spilled.

A large oil spill, fire, or explosion would likely cause unavoidable and significant adverse environmental impacts. The likelihood of a large spill or related fire or explosion is relatively low; however, the potential for significant consequences to the environment and human health if such an incident were to occur is high. The specific impacts would vary based on the location, amount spilled, type of liquid, and weather conditions. No mitigation measures would completely eliminate the possibility of an incident, nor would they completely eliminate the adverse consequences of an incident.

The main spill scenarios are summarized by activity (Table S-2).

Table S-2. Spill Scenarios

Source	Spill Scenario
Small	
Project site	2,100 gallons (50 barrels) spilled when transferring oil from rail cars or to vessels at the project site
Rail transport	1,000 gallons (24 barrels) spilled during a derailment along the PS&P rail line
Medium	
Project site	10,000 gallons (238 barrels) spilled when transferring oil to a vessel at the project site
	50,400 gallons (1,200 barrels) spilled from pipeline or storage tank at the project site
Rail transport	30,000 gallons (714 barrels or the contents of one full tank car) spilled during a derailment along the PS&P rail line
Large	
Project site	3.36 million gallons (80,000 barrels or the entire contents of one full storage tank) spilled on site
Rail transport	90,000 gallons (2,140 barrels or the contents of three full tank cars) spilled during a derailment along the PS&P rail line
	150,000 gallons (3,570 barrels or the contents of five full tank cars) spilled during a derailment along the PS&P rail line
	900,000 gallons (21,400 barrels or the contents of 30 full tank cars) spilled during a derailment along the PS&P rail line
Vessel transport	105,000 gallons (2,500 barrels) spilled into Grays Harbor from a vessel collision
	Up to 1.2 million gallons (29,000 barrels) from a vessel grounding in Grays Harbor
	15.1 million gallons (360,000 barrels or the entire contents of one full tanker, including fuel) spilled into Grays Harbor from a vessel allision at harbor entrance

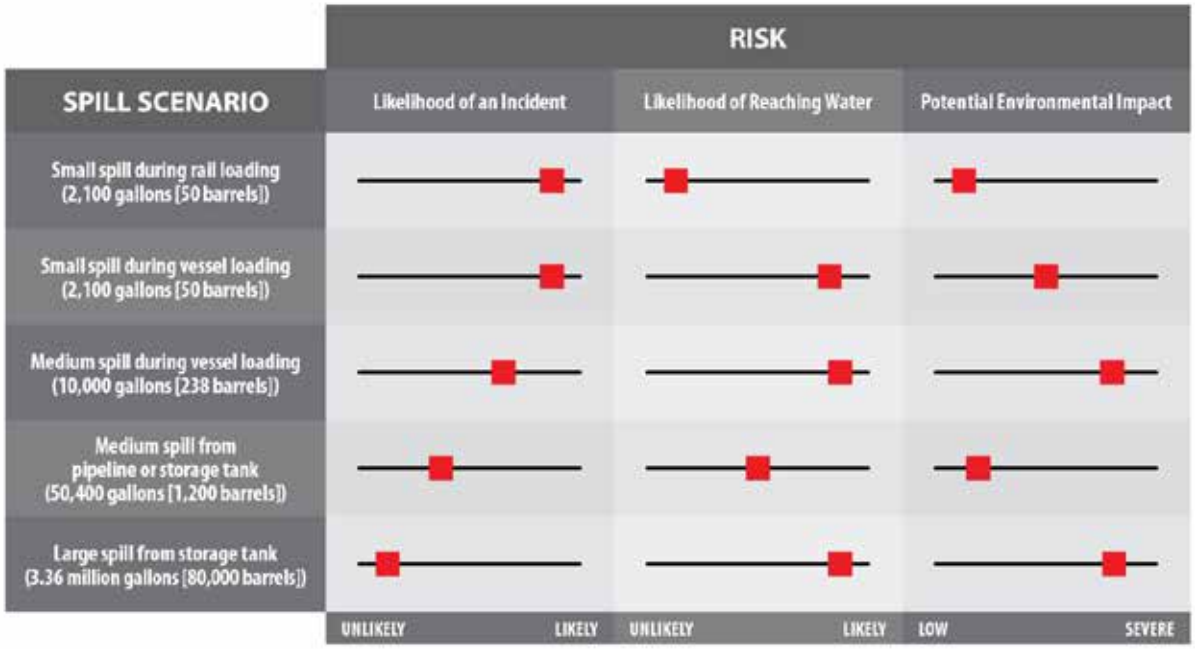
Risk of Oil Spills

Terminal (Onsite) Operations

For each of the spill scenarios related to onsite operations of the proposed action, Figure S-1 depicts the likelihood of the spill occurring, the likelihood of such a spill resulting in exposure to the environment, and the resulting extent of environmental damage that could occur.

Spill prevention, preparedness, and response requirements are intended to reduce the likelihood of a spill at the project site and the resulting environmental damage. Implementation of mitigation (Table S-1) would further reduce the risks associated with spills at the project site. Although the overall risks would be low, if a spill occurred, the potential environmental damage would be significant. These risks would remain even with implementation of mitigation.

Figure S-1. Environmental Health Risks from Potential Spills at the Terminal (Onsite)—Proposed Action



Rail Transport

For each of the spill scenarios related to rail transport along the PS&P rail line, Figure S-2 depicts the likelihood of the spill occurring, the likelihood of such a spill resulting in exposure to the environment, and the resulting extent of environmental damage that could occur.

Spill prevention, preparedness, and response requirements are intended to reduce the likelihood of a spill during rail transport and the resulting environmental damage. Implementation of mitigation (Table S-1) would further reduce the risks. Although the overall risks would be low, if a spill

occurred, the potential environmental damage would be significant. These risks would remain even with implementation of mitigation.

Figure S-2. Environmental Health Risks from Potential Spills during Rail Transport—Proposed Action

Vessel Transport

For each of the spill scenarios related to vessel transport in Grays Harbor, Figure S-3 depicts the likelihood of the spill occurring, the likelihood of such a spill resulting in exposure to the environment, and the resulting extent of environmental damage that could occur.

Spill prevention, preparedness, and response requirements are intended to reduce the likelihood of a spill during vessel transport and the resulting environmental damage. Implementation of mitigation (Table S-1) would further reduce the risks. Although the overall risks would be low, if a spill occurred, the potential environmental damage would be significant. These risks would remain even with implementation of mitigation.

Figure S-3. Environmental Health Risks from Potential Spills during Vessel Transport—Proposed Action

Risk of Fire or Explosion

In general, fires or explosions would be less likely than oil spills. Most of the materials that would be handled at the project site are in a liquid form and do not generate many vapors, which reduces the risk of such incidents. For each of the spill scenarios, Figure S-4 (onsite), Figure S-5 (rail transport), and Figure S-6 (vessel transport) depict the likelihood of the spill occurring, the likelihood of such a spill resulting in exposure to the environment, and the resulting extent of environmental damage that could occur.

Spill prevention, preparedness, and response requirements are intended to reduce the likelihood of a fire or explosion and the resulting environmental damage. Implementation of mitigation (Table S-1) would further reduce the risks. Although the overall risks would be low, if a spill occurred, the potential environmental damage would be significant. These risks would remain even with implementation of mitigation.

Figure S-4. Environmental Health Risks from Potential Fires or Explosions at the Terminal (Onsite)—Proposed Action

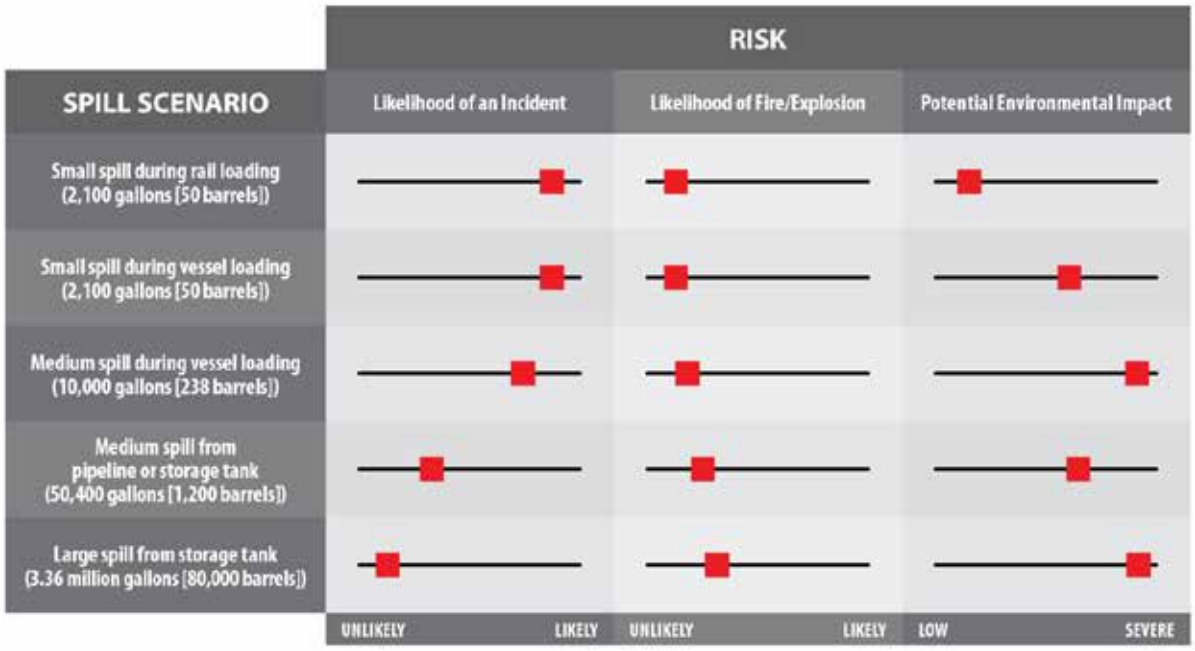


Figure S-5. Environmental Health Risks from Potential Fires or Explosions during Rail Transport—Proposed Action

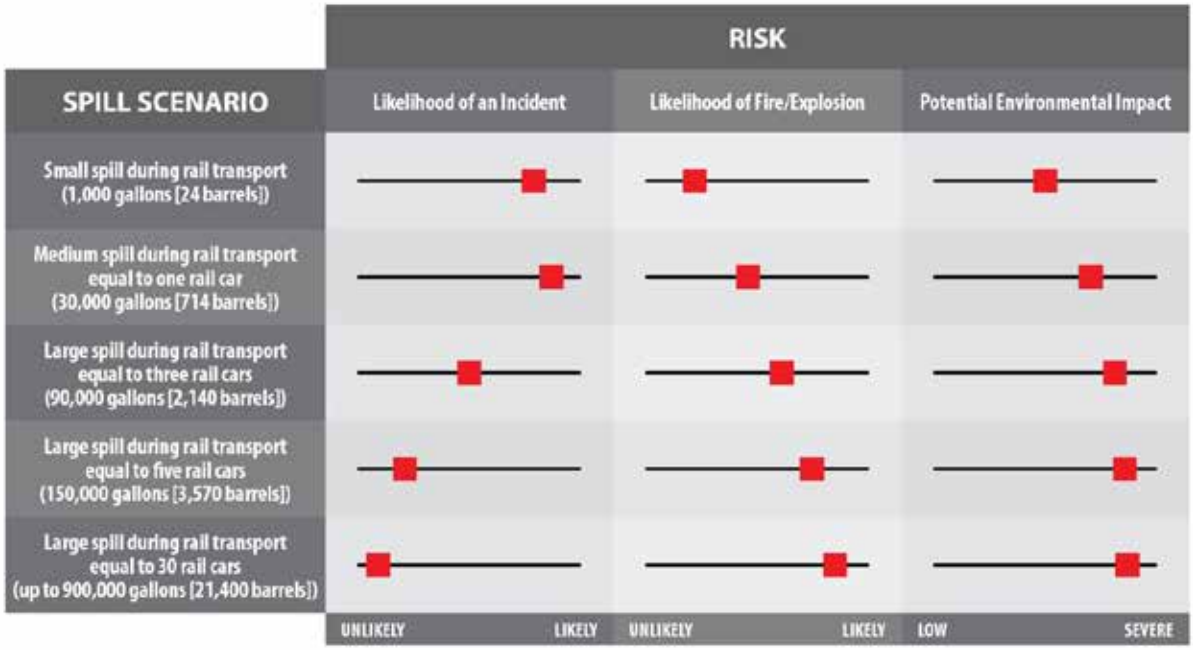


Figure S-6. Environmental Health Risks from Potential Fires or Explosions during Vessel Transport—Proposed Action

Environmental Damage

Depending on the circumstances of each incident, the extent of damage would vary. Factors that influence the spread of oil or hazardous materials include the amount spilled, type of material, location, weather, and actions taken to contain or respond to the incident.

Spills of crude oil are considered hazardous. These materials can damage plants, animals, and humans if prolonged exposure occurs. Additionally, Grays Harbor and the Chehalis River provide habitat for numerous sensitive and unique plant and animal species. The area also provides important commercial and recreational opportunities, including fishing and shellfish growing, and cultural, historical, and tribal resources. Potential impacts from oil spills, fires, or explosions are summarized by resource in Table S-3.

Table S-3. Environmental Damage from Oil Spills, Fires, or Explosions

Environmental Resource	Potential Impacts from Crude Oil Spill	Potential Impacts from Fire or Explosion
Water	Contaminated surface water and groundwater	Altered water chemistry
Plants	Stunted growth, impaired reproduction, and death; possible changes to overall community structure	Injury, death, impaired reproduction
Animals	Stunted growth, impaired reproduction, behavior changes, and death; possible changes to overall community structure	Injury, mortality, immigration, or emigration
Aesthetic	Degraded views from oil buildup	Degraded views from burns
Recreation	Degraded or closed recreational areas	Degraded or closed recreational areas
Cultural Resources	Contaminated historic resources, archeological sites, and culturally important areas, possible damage during cleanup activities	Damaged historic resources and culturally sensitive properties
Tribal Resources	Degraded water quality, fisheries, important plants, ceremonial qualities; possible damage and disturbance during cleanup activities	Degraded water quality, fisheries, important plants, ceremonial qualities
Human Health	Respiratory problems, dizziness, nausea, eye and throat irritation; however, levels of harmful chemicals typically below toxic levels within the first few minutes of a spill	Respiratory problems, dizziness, nausea, eye and throat irritation

What are the potential impacts of extended rail and vessel transport?

The proposed action would have potential rail transportation and vessel transportation impacts in the extended study area as a result of routine operation. The extended study area is rail transport along mainline routes beyond Centralia and vessel transport along commercial vessel routes off the Washington Coast, including Puget Sound.

Rail traffic related to the proposed action would account for a small percentage of BNSF rail traffic in Washington State: approximately 2% of the expected 2035 capacity estimated by the Washington State Department of Transportation for the main line along the Interstate 5 corridor and approximately 3% along the Columbia River Gorge. The following impacts in the extended study area could result from increased rail traffic.

- Increased emissions from more diesel trains.
- Increased noise at grade crossings and along the route.
- Increased vehicle delay at grade crossings, including disruption to emergency vehicle response times.
- Increased risk of a derailment, spill, or fire/explosion involving rail cars.

Vessel traffic in the extended study area from the proposed action would account for a small proportion of overall vessel traffic. The following impacts in the extended study area could result from increased vessel traffic.

- Increased emissions from vessel traffic.

- Increased noise from vessel traffic.
- Increased impacts on marine mammals from vessel traffic.
- Potential impacts on tribal resources from increased vessel traffic.
- Increased risk of a spill, fire, or explosion involving vessels.

What are the potential cumulative impacts?

The analysis considered other reasonably foreseeable projects, past and present actions, and future conditions for cumulative impacts in the study area. These cumulative projects are the proposed action, Westway Expansion Project, the Grays Harbor Rail Terminal Project, and dredging for the Grays Harbor Navigation Improvement Project.

Air

Air emissions associated with the cumulative projects are not anticipated to exceed applicable state and federal air quality standards; however, under worst-case conditions, the 1-hour standard for nitrogen oxides could be exceeded if all cumulative projects are conducting loading or unloading activities at the same time. Operation of the cumulative projects could also increase the risk that emissions of diesel particulate matter could affect residents around the project sites and Poynor Yard. Implementation of mitigation (Table S-1) such as reducing idling time and monitoring air emissions would likely reduce these impacts to acceptable levels.

Greenhouse gas emissions would increase with the cumulative projects. Cumulative greenhouse gas emissions for operations and transportation would be approximately 103,753 million metric tons per year. Cumulative emissions would represent approximately 0.1% of Washington State emissions, 0.002% of national emission reduction targets for 2025, and 0.00003% of global emission reduction targets.

Greenhouse gas emissions from the cumulative projects contribute to climate change at the global level. Climate change would affect Washington State and the region by increasing the risk of wildfires, floods and drought, changes in precipitation, increased temperatures, and ocean acidification. Climate change could contribute to sea level rise; however, no flooding from sea level rise is predicted at the project site.

Noise and Vibration

The cumulative projects would add 4.25 train trips per day to the 3 train trips per day under existing conditions. The increase in noise along the PS&P rail line could disturb residents and other sensitive groups. Using methods established by the Federal Rail Administration and Federal Transit Authority, assuming that the cumulative projects are operating at maximum throughput, 756 residents would be exposed to moderate noise increases from train horns, and 253 residents would be exposed to severe noise increases from train horns. Severe noise increases would be most likely near grade crossing in Elma, Satsop, Montesano, East Aberdeen, Malone, Porter, and Rochester.

The cumulative projects would also result in increases in wayside noise from the passing of a train. The greatest increases would occur between Elma and Satsop where 10 residences could be exposed to severe noise increases. Implementation of mitigation (Table S-1) such as quiet zones could reduce impacts associated with train horns if federal safety standards are otherwise met;

however, some residents would likely still experience unavoidable and significant adverse increases in noise.

Tribal Resources

At maximum throughput, operation of the cumulative projects would add 758 vessel trips to baseline forecasts of large commercial vessel trips along the navigation channel over the analysis period, for a total of 1,180 vessel trips or an average of three per day. This increased traffic and the increased occupancy of the Terminal 1 dock could disrupt tribal fishing in the navigation channel (approximately the Crossover Channel Reach of the navigation channel to the turning basin upstream of Terminal 2) and adjacent to Terminal 1, respectively.

Vessel traffic would not likely affect Quinault Indian Nation tribal resources outside of the navigation channel (including crab fishing in the harbor). However, vessel operations could exclude tribal fishers from a portion of their typical fishing area within the navigation channel (from approximately the Crossover Channel Reach of the navigation channel to the turning basin upstream of Terminal 2). Conflicts would be greatest during the fall salmon fishery when tribal fishers use gillnets. Vessel traffic could also reduce access to marine fisheries (including crab) in the ocean because tribal fishers may not be able to cross the bar when tank vessels are moving into or out of the navigation channel. Implementation of mitigation (Table S-1) to coordinate docking schedules with fishing schedules, provide advance notice of vessel calls and movements, and work with Quinault Indian Nation tribal officials to identify other measures as appropriate could reduce these impacts. Vessel transport related to the proposed action could exclude tribal fishers from fishing areas. If mitigation measures are not feasible, the proposed action could result in unavoidable and significant adverse impacts on tribal resources as described below.

Rail Traffic

The cumulative projects would add approximately 4.25 trips per day on average to the PS&P rail line to the approximately 3 trips per day under existing conditions. Based on modeling, the PS&P rail line has the capacity to handle up to 12 trips per day. Although the total number of minutes each day that grade crossings would be blocked along the PS&P rail line would increase, trains associated with the cumulative projects could be accommodated on the PS&P rail line with existing infrastructure and there would be no cumulative impacts on rail traffic.

Vehicle Traffic and Safety

Increased rail traffic associated with the cumulative projects, described above, would increase vehicle delays at grade crossings along the PS&P rail line. These delays would not be substantial for most of the rail line between Centralia and Aberdeen, because the chance of encountering a blocked grade crossing would remain relatively low.

Vehicle delay would be most substantial in Centralia and Aberdeen. Vehicle delay would be greatest if a train traveled to or from the project site during rush hour. In Aberdeen, rail operations on the PS&P rail line are heavily influenced by train movements related to Poynor Yard. Substantial vehicle delays would occur with the cumulative projects in Aberdeen from the eastern end of the Olympic Gateway Plaza (Fleet Street) to the Port area and in Centralia at Tower Street, Pearl Street, and H Street grade crossings.

Vehicles at grade crossings in Aberdeen would be affected by switching operations between Poynor Yard and the project sites and would experience longer delays.[5] Currently, vehicles have to wait when trains block grade crossings in the Olympic Gateway Plaza for up to 44 minutes per train about four times per week. For the cumulative projects, this delay would increase to up to 52 minutes 19 more times per week.

Vehicle delay would also substantially increase in the Port area near the project sites. Trains currently occupy grade crossings in this area for up to 13 minutes four times per week. This time would increase up to 22 minutes for the Westway project and up to 77 minutes for the Imperium project. The number of times per week vehicles would have to wait would increase from four times per week to 15 times per week with both Westway and Imperium projects.

Vehicle delays at grade crossings could cause congestion and delays at upstream intersections (east of the project sites). All such delays would affect emergency vehicles unless alternative routes were available. Implementation of mitigation (Table S-1), including the applicant working with local jurisdictions to implement accepted measures to address these delays, could reduce these impacts. In addition, the applicant would ensure that sufficient emergency service equipment is available to local emergency service providers for the Olympic Gateway Plaza are that might otherwise be temporarily inaccessible by vehicle due to blocked grade crossings. If the Westway Expansion Project is also approved, similar measures would apply to that applicant.

Increased rail traffic related to the cumulative projects could increase the frequency of accidents along the PS&P rail line. The grade crossings that would have the shortest predicted intervals between accidents would be in Aberdeen near the Olympic Gateway Plaza and in the Port area because of switching operations involving Poynor Yard. Both vehicle delays and accident frequencies would generally improve by 2037 for some grade crossings because improvements such as grade-crossing protections are assumed to be implemented by then. Additionally, improvements considered for the East Aberdeen Mobility Project would likely improve both delay and safety at grade crossings in the Olympic Gateway Plaza area.

Implementation of mitigation (Table S-1) could help to decrease vehicle delays and emergency access issues under cumulative conditions. Potential infrastructure changes in the future may also reduce impacts. If mitigation is not feasible or infrastructure changes do not occur, the proposed action would have unavoidable and significant adverse impacts on vehicle delays from trains blocking crossings in the Olympic Gateway Plaza and Port areas of Aberdeen.

Vessel Traffic

At maximum throughput, the cumulative projects would add 758 tank vessel trips per year to large commercial vessel trips forecast over the analysis period, for a total of 1,180 vessel trips. Considering the opportunities available for these vessels to travel through the harbor at various channel depths, the cumulative projects would not exceed the capacity of the navigation channel. The increase in vessel traffic would increase the demand for escort tugs and pilots in Grays Harbor but this demand could be managed with existing services.

[5] Relates only to the proposed action and Westway Expansion Project.

Adding the maximum number of days that tank vessels related to the cumulative projects[6] (up to 319 days) would be docked at Terminal 1 to the number of days forecast for baseline vessels, the Terminal 1 berth would be occupied 363 days per year. Although this exceeds the number of days that the Terminal 1 berth would be available per year (90% of 365 days = 328 days), it is based on the very conservative assumptions.[7] Moreover, if tankers were used instead of tank barges, berth occupancy could be as low as 284 days per year and there would be sufficient capacity.

The increased vessel traffic could affect commercial and recreational fishers by disrupting fishing in the navigation channel, particularly from the Crossover Channel Reach of the navigation channel to the turning basin and at Terminal 1. Vessel traffic would not affect commercial or recreational fishing outside the navigation channel (including crab fishing in the harbor). Conflicts would be greatest during the fall salmon fishery when the most commercial fishing boats are present. Other fishing areas are available and the overall fishing area potentially affected by increased vessel traffic is not expected to affect commercial or recreational fishing significantly. Implementation of mitigation (Table S-1) could also reduce potential impacts.

Environmental Health and Safety

As described above, potential impacts of a spill, fire, or explosion vary based on the incident. A large oil spill, fire, or explosion would likely cause unavoidable and significant adverse environmental impacts. The likelihood of a large spill or related fire or explosion is relatively low; however, the potential for significant consequences to the environment and human health if such an incident were to occur is high. The specific impacts would vary based on the location, amount spilled, type of liquid, and weather conditions. No mitigation measures would completely eliminate the possibility of an incident, nor would they completely eliminate the adverse consequences of an incident.

The spill scenarios used in the risk assessment for the proposed action were also used to assess risks of the cumulative projects. These scenarios looked at terminal operations, rail transportation, and vessel transportation. The orders of magnitude of risk were very similar to the risk under the proposed action for the likelihood of a spill, the likelihood of reaching water, the likelihood of a fire or explosion resulting from a spill, and the potential for environmental impacts.

In general, for operations at any of the project sites, the cumulative projects would result in the potential for more frequent spills of bulk liquids relative to the proposed action alone. The increased number of rail trips and vessel trips related to the cumulative projects pose a greater potential for more frequent spills of bulk liquids relative to the proposed action alone.

In general, fires or explosions occur as the result of some but not all oil spills. An incident is most likely to occur during transport when higher speeds provide enough energy to generate a spark. Because allowable train speeds along the PS&P rail line and vessel speeds in the harbor are low, the likelihood of a fire or explosion during transport is reduced, although the potential for environmental harm if a fire occurred with or without an explosion could be quite severe.

[6] Only includes vessels related to the Westway and Imperium Expansion Projects, because vessels associated with the Grays Harbor Rail Terminal project would call at Terminal 3.

[7] Maximum number of vessels (tank barges) and a full 24 hours to load each tank barge.

What are the potential economic impacts on the City of Hoquiam?

Economic impacts were analyzed in accordance with the Hoquiam Municipal Code. No additional economic analysis was conducted as part of the environmental review.

Construction

Construction would temporarily stimulate the economy through purchases of materials, supplies, equipment, and services; payroll to construction workers; and related indirect and induced effects. Construction would result in various tax revenues accruing to state and local governments.

Operations

Operation would likely result in increased employment and income associated with direct spending for labor salaries and material purchases. Additionally, these activities could result in indirect and induced employment and income impacts. The annual economic output of the proposed action in Grays Harbor County is estimated at $77.8 million. At full buildout, the proposed action would generate an estimated 103 direct jobs in Grays Harbor County.

What are the potential social policy impacts of the proposed action?

Construction

Construction would not result in elements that would bisect, disrupt, or isolate any established communities or change the existing community character, nor would it require relocating any residences or businesses. Construction would not have a significant impact on community welfare because it would not substantially degrade air quality, increase noise, reduce access to recreational facilities, or reduce property values. Construction would not result in the permanent relocation of workers from outside the study area, displacement of local residents, or the requirement for additional housing, and would not disproportionately affect minority and low-income populations.

Operations

Onsite operations of the proposed action would not require acquisition of new properties that would require relocating any residences or businesses, nor would it change the existing community character. Although the PS&P rail line is an existing facility, the increased traffic associated with the proposed action would have an impact on community cohesion in Aberdeen from increased vehicle delay. Vessel traffic and docked vessels associated with the proposed action would have an impact on community cohesion by disrupting commercial and tribal fishing that occurs in the navigation channel and at Terminal 1, respectively. The increase in vessels would limit the timing, duration, and physical area that could be fished.

Community welfare impacts off site would be related to air, noise, recreation, vehicle traffic, and environmental health and safety impacts as described in the respective sections above. Operation of the proposed action would have a limited potential to affect population demographics.

Routine onsite operations are not anticipated to result in significant environmental impacts and would, therefore, not be expected to disproportionately affect minority and low-income populations

around the project site. For rail and vessel transport, minority and low-income populations closest to the rail line and around Grays Harbor could be disproportionately affected. Potential disproportionate impacts from rail transport would include increased noise, air emissions, and vehicle delay. Potential disproportionate would also include increased exposure to risks of incidents resulting in spills, fires, or explosions.

What are the costs and benefits of the proposed action to the City of Hoquiam?

Cost-benefit impacts were analyzed in accordance with the Hoquiam Municipal Code. No additional cost benefit analysis was conducted as part of the environmental review. Implementation of the proposed action would result in some economic and financial benefits to the City of Hoquiam as well as some costs. Table S-4 summarizes the main benefits and costs from the proposed action. When enough information was available, monetary estimates are provided in 2013 dollars.

If additional projects, such as the Westway Expansion Project and Grays Harbor Rail Terminal Expansion project are implemented, the potential for more significant impacts on rail congestion, vehicle congestion, and the related safety concerns would also increase.

Table S-4. Main Benefits and Cost of the Proposed Action to the City of Hoquiam (2013 Dollars)

Benefits	Quantification
Direct labor income during construction	Estimate: $3.1 million to $3.6 million
Annual direct labor income during each year of operations	Estimate: $260,000 to $325,000 per year
Additional labor income associated with indirect and induced jobs in during construction and operations	Not estimated
Property tax collections during construction	Estimate: $120,428
Property tax collections during each year of operations	Estimate: $1.0 million per year
Additional tax collections during construction and operations from local sales and use tax, business and occupation tax and utility taxes	Not estimated
Costs	
Increased traffic delays	Previous studies estimate: $9.66 and $16.18 per person delayed in traffic, per hour, for local traffic $16.51 and $24.76 per person delayed in traffic, per hour, for intercity traffic
Increased exposure to traffic accidents risks	Previous studies estimate: $3,037 per person to $1.5 million per person involved in a traffic accident, depending on severity of incident
Cost of training for the City of Hoquiam Fire Department on flammable liquid fires risks and to review and practice material release emergency response	Not estimated
Potential decrease in property values	Previous studies estimate: $3,500 to $5,800 on average 3 to 5% for increases of 9 trips per day 5 to 20% for increases of 18 trips per day

What permits and plans apply to the proposed action?

The following permits and/or approvals would be required for the proposed action.

City

- City of Hoquiam Critical Areas Review for fish and wildlife habitat and geologically hazardous areas
- City of Hoquiam Shoreline Substantial Development Permit
- City of Hoquiam Conditional Land Use Permit
- City of Hoquiam Building Permit
- City of Hoquiam Grade and Fill Permit
- City of Hoquiam Fire Department Permit
- City of Aberdeen Utility Services Agreement
- City of Aberdeen Critical Areas Review for fish and wildlife habitat and geologically hazardous areas
- City of Aberdeen Shoreline Substantial Development Permit
- City of Aberdeen Building Permit
- City of Aberdeen Grade and Fill Permit
- City of Aberdeen Fire Department Permit

State

- Washington State Department of Ecology National Pollutant Discharge Elimination System Construction Stormwater General Permit
- Washington State Department of Ecology Resource Conservation and Recovery Act Notice of Registration Update
- Washington State Olympic Region Clean Air Agency Approval Order
- Washington State Department of Ecology National Pollutant Discharge Elimination System Industrial Stormwater Permit
- Washington State Department of Ecology Spill Prevention Plan
- Washington State Department of Ecology Spill Contingency Plan
- Washington State Department of Ecology Facility Operations Manual
- Washington State Department of Ecology Oil Handling Facility Training and Certification Report
- Washington State Department of Ecology Oil Handling Facility Safe and Effective Threshold Report
- Washington State Department of Labor and Industries – Certificate of Industrial Insurance Coverage
- Washington Department of Licensing – Fuel Tax License

Federal

- Integrated Contingency Plan (One Plan)[8] that addresses the following required plans:
  - U.S. Environmental Protection Agency Facility Response Plan
  - U.S. Environmental Protection Agency Spill Prevention Control and Countermeasure Plan
  - U.S. Coast Guard Facility Response Plan
  - U.S. Coast Guard Letter of Intent
  - U.S. Coast Guard Oil Spill Response Plan
  - U.S. Coast Guard Facility Security Plan and Facility Security Assessment
  - U.S. Coast Guard Operations Manual Update

What are the unavoidable and significant adverse impacts?

Implementation of mitigation (Table S-1) would reduce but not completely eliminate significant adverse impacts on noise, tribal resources, vehicle traffic, and environmental health and safety. The following sections describe the unavoidable and significant adverse impacts of the proposed action.

Noise

The proposed action would result in increased rail traffic on the PS&P rail line that could cause substantial increases in noise in certain areas between Centralia and the project sites. The most adverse noise impacts would be from locomotive horns sounded for public safety near certain grade crossings. Railroad noise is exempt from Washington State and local noise limits; however, it is possible for communities to work with the Federal Railroad Administration to apply for a quiet zone to limit train horn sounding. The applicant will work with PS&P and interested communities, if requested, to develop quiet zones. However, as long as locomotive horns continue to sound for safety, the potential for unavoidable and significant noise impacts in areas along the PS&P rail line would remain.

Tribal Resources

Implementation of mitigation (Table S-1) would reduce but would not completely eliminate impacts on tribal resources. Vessels related to the proposed action would travel through usual and accustomed fishing areas in Grays Harbor. Under current and future conditions, increased vessel traffic could restrict access to tribal fishing areas in the navigation channel and adjacent to Terminal 1. This conflict is most likely to occur for fishing related to harvest of salmon, steelhead, and sturgeon. Because other factors besides vessel operations affect fishing opportunities, such as the number of fishers, fish distribution, timing, and duration of fish windows, the extent to which vessel operations related to the proposed action would affect tribal fishing is difficult to quantify. No mitigation measures would completely eliminate the possibility of impacts on fishing resources because of vessel operations related to the proposed action.

[8] The Integrated Contingency Plan process allows a facility to comply with multiple federal planning requirements, including those required by the U.S. Environmental Protection Agency, U.S. Coast Guard, Occupational Safety and Health Administration, Office of Pipeline Safety of the Department of Transportation, and Minerals Management Services in the Department of the Interior, by consolidating them into one functional emergency response plan.

Vehicle Traffic and Safety

Implementation of mitigation, plans, and infrastructure improvements (Table S-1) would reduce impacts on vehicle traffic but would not completely eliminate them. The proposed action would have unavoidable and significant adverse impacts on vehicle delay from trains blocking grade crossings in the Olympic Gateway Plaza and Port areas of Aberdeen.

Environmental Health and Safety

A large oil spill or related incident involving a fire or explosion would likely result in unavoidable and significant adverse environmental impacts. The likelihood of a large spill or related explosion is low; however, the potential for significant consequences to the environment and human health in the case of a large spill, fire, or explosion is high. The specific impacts would vary based on the location, amount spilled, type of liquid, and weather conditions. While regulatory requirements for the prevention of, preparedness for, and response to a large spill or explosion and mitigation measures exist, no mitigation measures would completely eliminate the possibility of a large spill or related fire or explosion, nor would they completely eliminate the adverse consequences of such incidents.

Cumulative Impacts

Because the cumulative projects, including the proposed action, would have unavoidable and significant adverse environmental impacts on noise, tribal resource, vehicle traffic, and environmental health and safety, the proposed action would contribute to unavoidable and significant adverse environmental cumulative impacts on these resources.

Next Steps

Comments received on the Draft EIS during the 60-day comment period (August 31 through October 29, 2015) will be compiled and reviewed, and the Final EIS will be prepared. The co-lead agencies anticipate that the Final EIS will be published in spring 2016, but that is subject to change. All comments and responses to comments received on the Draft EIS will be included in the Final EIS. The Final EIS will be used by the local and state agencies in making permit decisions for the proposed action. Seven days following publication of the Final EIS, permits for construction and operation of the project may be issued. Construction of the proposed action could begin in 2016.

Table S-1. Summary of Impacts Requiring Mitigation

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?

3.1 Earth	The addition of buildings, storage tanks, and related infrastructure carrying and storing the proposed bulk liquids could expose people to harm if damaged during a seismic event, such as an earthquake. Under the no-action alternative, the risk remains the same as current conditions.	• To minimize the potential for impacts at the project site related to unstable soils, the applicant will review and update the construction mitigation measures identified in GeoEngineers (2006) and discussed in GeoEngineers (2014). These measures for site preparation and construction will be implemented during construction.
		  ◦ Over-excavate the existing soil and compact the exposed soil to a uniformly firm and unyielding condition prior to placement of fill.
		  ◦ Based on existing site grades and proposed development, standard erosion control measures are considered adequate; however, if construction and grading are staged, slopes may be created that require additional erosion control measures.
		  ◦ For railroad spurs on site, support, over-excavate, and recompact materials so that there is a minimum of 2 feet of compacted fill.
		• To minimize the potential for damage to the storage tanks related to geologic risks and unstable soils, the applicant will install pile-supported foundations that extend up to 75 feet deep for storage tanks to avoid excessive settlement from potentially liquefiable materials.
		• To minimize the potential for damage to the storage tanks related to geologic risks and unstable soils, the applicant will develop final design specifications for proposed structures based on evaluation of the following more current standards/information (some of which were identified in GeoEngineers 2014).
		  ◦ U.S. Geological Survey ground-shaking report and maps released in July 2014 (Petersen et al. 2014)
			No

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?
		¡ American Petroleum Institute Standard 650 (2012) ¡ International Building Code 2012	
3.1 Earth	The proposed facilities could expose workers at the project site to increased risks of harm from a tsunami. Although the likelihood of a tsunami would remain unchanged compared to existing conditions, the new facilities would result in new infrastructure and additional workers that would be exposed to these risks. Under the no-action alternative, the risk remains the same as current conditions.	¡ The applicant will ensure that a tsunami evacuation and emergency management plan is prepared prior to beginning project operations. This plan will consider evacuation planning, identification of safe havens, and identification of evacuation routes to natural high ground and will be developed in coordination with emergency management officials.	Yes
3.1 Earth	The new storage tanks and related infrastructure carrying and storing the proposed bulk liquids could rupture in the event of a tsunami and expose people and the environment to increased harm. Under the no-action alternative, the risk remains the same as current conditions.	¡ To reduce the potential for environmental damage related to a tsunami event, the applicant will conduct a study to assess the technical feasibility and cost of implementing measures to construct the proposed facilities to withstand a Cascadia Subduction Zone (CSZ) L1 tsunami wave based on the Scenario 2 inputs listed in Table 4 of the Tsunami Impact Modeling and Analysis (Appendix C of this Draft EIS). Agreed upon measures will be implemented prior to project design and construction in coordination with the co-lead agencies.	Yes

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?

3.2 Air	Construction and operation of the proposed action could result in increased air emissions, including nitrogen oxides and diesel particulate matter, which could exceed acceptable thresholds compared to the no-action alternative.	- The applicant will ensure that all engine-powered equipment and vehicles used in construction, operation, and maintenance at the facility are subject to a regular inspection and maintenance schedule in order to minimize air pollutant emissions, greenhouse gas emissions, and fuel consumption. Preventive maintenance activities will include but not be limited to the following actions.
		  - Replacing oil and oil filters as recommended by manufacturer instructions.
		  - Maintaining proper tire pressure in on-road vehicles.
		  - Replacing of worn or end-of-life parts.
		  - Scheduling routine equipment service checks
		- The applicant will develop and implement an anti-idling policy for both construction and operation and ensure that equipment operators receive training on best practices for reducing fuel consumption in order to reduce project-related greenhouse gas emissions. The anti-idling policy will include required warmup periods for equipment and prohibit idling beyond these periods. The policy will define any exemptions where idling is permitted for safety or operational reasons, such as when ambient temperatures are below levels required for reliable operation. In addition, the use of technologies such as idle management systems or automatic shutdown features will be considered part of the policy.
		- To monitor diesel particulate matter (DPM) emissions associated with rail operations at and near the project site, the applicant will ensure a DPM monitoring station is installed prior to beginning operations. The applicant will ensure the DPM emission report is submitted to the City of Hoquiam annually. The City of Hoquiam will coordinate with the City of Aberdeen, Ecology, and Olympic Region Clean Air Agency as applicable, to review the emission report. If DPM emissions are
			No

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?
		observed to approach levels of concern for sensitive receptors, then the City of Hoquiam will require the applicant to modify operations to reduce DPM emissions. These actions could include: - Modifying or reducing switching operations between Poynor Yard and the project site to reduce DPM emissions during switching operations - Installing a commercial idle control retrofit device on switching locomotives to reduce DPM emissions from idling - Using Tier 3 or Tier 4 compliant[9] switching engines at Poynor Yard - To reduce greenhouse gas emissions, DPM, and other air pollutants from the locomotives, idling will be minimized to the maximum extent practicable. Shutting down locomotive engines as soon as practicable when not in use and delaying restart until necessary for car switching or departure from the facility would reduce these pollutants. - To minimize idling from trains and vessels and resulting emissions, the applicant will coordinate with the Port of Grays Harbor and PS&P to manage waiting times for rail and vessel arrivals or departures.	
3.4 Plants/ 3.5 Animals	Increased vessel traffic related to the proposed action could increase the risk of spread of invasive species compared to the no-action alternative.	- To reduce the potential for impacts on sensitive aquatic plants/animals from the increase in ballast water discharges during operations, the applicant will prepare an invasive species monitoring plan in consultation with Washington Department of Fish and Wildlife and implement the plan prior to start of the proposed operations.	No

[9] These refer to standards for implementing the Environmental Protection Agency's program to improve locomotive efficiency to reduce emission of particulate matter and nitrous oxides.

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?
3.5 Animals	Pile driving noise during construction of the proposed action could adversely affect sensitive aquatic species.	To reduce the risk of harm to sensitive aquatic species from pile driving, the applicant will investigate alternative pile driving methods such as vibratory pile driving and hydraulic press-in methods to eliminate the need for impact pile driving. If these methods are determined to be infeasible, the applicant will retain a qualified acoustical consultant to monitor underwater sound levels during pile driving at the closest in-water location 1 meter deep. Piles will be driven first at locations that are closest to the water bodies of concern. The maximum number of piles that can be driven in a day will be driven to capture the worst-case accumulated sound exposure level. If measured underwater sound levels at the closest location do not exceed the applicable accumulated sound exposure level threshold during the first two days of driving no additional monitoring will be required and pile driving will continue. If the accumulated sound exposure level is exceeded at the closest distance, monitoring will be moved to a distance of 210 feet from the pile driving. If on any given day the accumulated sound exposure level threshold is exceeded at that distance, pile driving for that day will be stopped and continued the next day.	No
3.5 Animals	The risks of larger spills of crude oil from vessel loading could adversely affect sensitive plant and animal species.	**Voluntary measure:** To reduce the risk of spills affecting high numbers of migratory birds during peak spring migration (typically 2 weeks), the applicant will coordinate with the City of Hoquiam to receive advance notice of the date for the annual Grays Harbor Shorebird Festival. The applicant will halt crude oil vessel loading operations for a period of 2 weeks each year overlapping with the event.	Yes

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?

3.6 Energy	Construction and operation of the proposed action could result in increased energy consumption compared to the no-action alternative, although this would not be a significant impact.	- **Voluntary measure:** To minimize energy use, the applicant will
		  - Employ the most energy-efficient systems for all pumps, motors, electrical equipment, and process technology equipment as practicable.
		  - Apply U.S. Green Building Council Leadership in Energy and Environmental Design (LEED) Silver Standards to the design of new buildings.
			No

3.7 Noise and Vibration	Construction of the proposed action could result in short term, temporary increased in low levels of noise at the project site.	- To reduce construction noise at nearby sensitive receptors, the applicant will maintain construction and maintenance equipment in good working order with properly functioning mufflers to control noise.	No
3.7 Noise and Vibration	Increased rail traffic related to the proposed action could increase noise levels for residents and other sensitive groups along the PS&P rail line.	- To address increased noise from rail traffic, the applicant will coordinate with PS&P and interested communities along the PS&P rail line on the creation of quiet zones, if requested. Elimination of locomotive horn sounding at the affected grade crossings would eliminate impacts from increased horn noise. Quiet zones can only be established by public agencies using a procedure established in Federal Railroad Administration (FRA) regulations. The quiet zone allows the installation of enhanced safety measures at grade crossings such that train horns would not be required to be used. Implementation of a quiet zone is subject to FRA approval. Quiet zones include measures to maintain the level of safety while reducing noise.	Yes

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?
3.9 Aesthetics, Light and Glare	The proposed action could result in new facilities that would be visible from surrounding areas although the overall impact would not be significant.	- To reduce potential glare, the applicant will ensure the proposed storage tanks are of a tone that blends into the surrounding landscape and/or match the existing facility tank paint or insulation, appropriate to the existing design and without affecting air emissions for the surrounding facilities. - To ensure that lighting at the project site does not conflict with other land uses, the applicant will coordinate with the Port of Grays Harbor to develop the proposal for project lighting.	No
3.10 Recreation	Increased rail and vessel traffic related to the proposed action could result temporarily disrupt access to recreational areas along the PS&P rail line and in Grays Harbor although the overall impact would not be significant.	- To mitigate vehicle traffic impacts associated with rail operations related to the proposed action, the applicant will work with the City of Hoquiam, the City of Aberdeen, the Port of Grays Harbor, the Grays Harbor Council of Governments, and PS&P to address vehicle delays and/or inform motorists of potential blockages at PS&P rail line crossings into and out of Olympic Gateway Plaza. The Washington State Department of Transportation (WSDOT), City of Hoquiam, City of Aberdeen, and Port of Grays Harbor will approve proposed measures for the areas where they are responsible for vehicle delay. The applicant will ensure acceptable measures are in place prior to beginning project operations. The proposed changes should include an evaluation of impacts on potentially affected low-income and minority populations. - While fishing boats are required to follow the U.S. Coast Guard navigation rules, to improve awareness of vessel traffic in the navigation channel, the applicant will work with the Grays Harbor Safety Committee, including the U.S. Coast Guard and Port of Grays Harbor, to establish procedures to announce project related vessel traffic arrivals and departures over a designated VHF marine radio channel.	No

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?
3.11 Cultural Resources	There is a low but increased possibility that construction activities involving ground disturbance could result in impacts on otherwise unknown archaeological resources compared to the no-action alternative.	- To reduce the risk of disturbing undocumented cultural resources, the applicant will prepare an unanticipated discovery plan to address previously unidentified archaeological resources should any be discovered during the construction of the proposed action. The applicant will submit the plan to the Washington State Department of Archaeology and Historic Preservation before construction. The plan will contain provisions requiring that if archaeological resources are uncovered during excavations, construction activities will cease immediately and the applicant will notify the City of Hoquiam, the Department of Archaeology and Historic Preservation, the Quinault Indian Nation, and the Confederated Tribes of the Chehalis Reservation. In such cases, the applicant will provide for a site inspection and evaluation by a professional archaeologist to ensure that all possible valuable archaeological data are properly salvaged or mapped.	No
3.12 Tribal Resources	Increased vessel traffic related to the proposed action in Grays Harbor could increase the potential for conflict with fishing areas and access to fishing areas for the Quinault Indian Nation compared to the no-action alternative.	- To mitigate potential impacts on tribal fishing, the applicant will coordinate with the Quinault Indian Nation and Washington Department of Fish and Wildlife, as requested, to support review and possible adjustments of docking schedules to minimize conflict with fishing schedules negotiated preseason by the state and tribe. Consultation will account for operations, including anticipated vessel movements related to the proposed action. - While tribal fishing boats are required to follow the U.S. Coast Guard navigation rules, to improve awareness of vessel traffic in the navigation channel, the applicant will work with the Grays Harbor Safety Committee, including the U.S. Coast Guard and Port of Grays Harbor, to establish procedures to announce project related vessel traffic arrivals and departures over a designated VHF marine radio channel.	Yes

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?
		- To mitigate impacts on access to tribal treaty fishing areas, the applicant will initiate a process between stakeholders and Quinault Indian Nation tribal officials to discuss and identify additional mitigation measures such as, adjusting the timing of vessel calls during peak fishing seasons. Initiation of the process between the parties will occur before the proposed vessel operations begin.	

3.14 Hazardous Materials	Construction could increase the risk of exposing existing hazardous materials that are already present at the project site compared to the no-action alternative.	- If groundwater or odiferous, stained, or discolored soil is encountered during construction activities, or if groundwater encountered is suspected to be contaminated during construction activities, the following mitigation measures will be implemented.
		  - The applicant will seek the professional recommendation of a consultant specializing in the handling and identification of hazardous materials and contaminated media.
		  - If deemed necessary, based on the above consultation, the applicant will conduct soil and/or groundwater testing for identification of possible hazardous materials.
		  - Construction personnel will isolate and cover suspect soil until analytical results are reviewed by qualified personnel.
		  - The consultant will compare analytical results to the applicable U.S. Environmental Protection Agency's regional screening levels, which address common environmental pollutants. If hazardous materials are discovered in the soils and/or groundwater at levels above the regional screening levels, the consultant will provide recommendations on the steps required for proper treatment and/or removal and disposal of the contaminated media.
		- Due to existing previously identified contamination on the project site, during excavation and grading activities, the
			No

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?
		applicant and the earthworks contractor will implement the following mitigation. - The applicant will require that the earthworks contractor comply with training requirements for handling of contaminated material. This recommendation is consistent with Washington Administrative Code 296-843-100, Hazardous Waste Operations, which indicates that onsite employees are required to have current health and safety training in accordance with Hazardous Waste Operations and Emergency Response requirements in Occupational Safety and Health Administration, 29 Code of Federal Regulations 1910.120. - Onsite workers working within a contaminated zone will be required to comply with Occupational Safety and Health Administration, 29 Code of Federal Regulations 1910.120, if contaminants are detected in soil at concentrations greater than the Model Toxics Control Act, Method A Unrestricted Land Use cleanup levels (Washington Administrative Code 173-340). - The applicant will prepare a soil management plan to provide appropriate procedures for handling, sampling, transporting, placing, and disposing of the media generated during construction of the proposed action. - The construction contractor will handle soil excavated from the project site in accordance with all local, state, and federal regulations.	
3.16 Vehicle Traffic and Safety	Increased rail traffic related to the proposed action could result in substantial increases in vehicle delay at the Olympic Gateway Plaza and between Poynor Yard and the project site	To mitigate vehicle traffic impacts associated with rail operations of the proposed action, the applicant will work with the City of Hoquiam, City of Aberdeen, Port of Grays Harbor, Grays Harbor Council of Governments, and PS&P to address vehicle delay and/or inform motorists of potential blockages at PS&P crossings between the project site and Poynor Yard.	Yes

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?
	compared to the no-action alternative.	WSDOT, the City of Hoquiam, City of Aberdeen, and Port of Grays Harbor will approve proposed measures for the areas where they are responsible for vehicle delay. The applicant will ensure measures are in place prior to beginning the proposed operations. The proposed changes should include an evaluation of impacts on potentially affected low-income and minority populations. - To mitigate vehicle traffic impacts associated with rail operations related to the proposed action, the applicant will work with the City of Hoquiam, City of Aberdeen, Port of Grays Harbor, Grays Harbor Council of Governments, and PS&P to address vehicle delays and/or inform motorists of potential blockages at PS&P grade crossings into and out of the Olympic Gateway Plaza. WSDOT, the City of Hoquiam, City of Aberdeen, and Port of Grays Harbor will approve proposed measures for the areas where they are responsible for vehicle safety. The applicant will ensure acceptable measures are in place prior to beginning the proposed project operations. The proposed changes should include an evaluation of impacts on potentially affected low-income and minority populations.	
3.16 Vehicle Traffic and Safety	Increased rail traffic related to the proposed action could block vehicular access, including emergency service access, to the Olympic Gateway Plaza and between Poynor Yard and the project site for a substantial period compared to the no-action alternative.	- To reduce the potential for increased delay of emergency vehicles at PS&P grade crossings during project operations, the applicant will work with local emergency service providers to provide advance notification of incoming trains. - To ensure that local emergency service providers have access to areas south of the PS&P rail line in Aberdeen, the applicant will ensure that an emergency response vehicle with an 8-foot clearance is available and staged at the City of Aberdeen Fire Department. The applicant will also ensure a new combination pumper truck is available and staged at the City of Hoquiam's Eastside Fire Station to respond to incidents at the nearby	Yes

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?
		project sites. These measures will be in place prior to beginning crude oil operations. - To address the potential for emergency access conflicts to areas along the PS&P rail line during unplanned unit train stoppages, the applicant will work with PS&P and local emergency service providers along the PS&P rail line to develop and implement a notification protocol to inform local emergency service providers and other interested parties of the duration and magnitude of the unplanned stoppages. The notification protocol will be in place prior to the beginning of operations involving transport of crude oil.	
3.16 Vehicle Traffic and Safety	Increased rail traffic related to the proposed action could increase the potential for vehicle accidents along the PS&P rail line compared to the no-action alternative. Under the no-action alternative, the number of trains is expected to increase slightly due primarily to increases in vehicle traffic.	- To address potential vehicle safety impacts, each of the public at-grade crossings on the rail line, the applicant will work with PS&P to provide permanent signs that prominently display both a toll-free telephone number and a unique grade-crossing identification number in compliance with Federal Highway Administration regulations (23 Code of Federal Regulations 655). The toll-free number would enable drivers to report promptly any accidents, malfunctioning warning devices, stalled vehicles, or other dangerous conditions. The signs will be in place prior to the beginning of operations involving transport of crude oil. - To address potential vehicle safety impacts, the applicant will coordinate with PS&P to make Operation Lifesaver educational programs available to communities, schools, and other organizations located along the rail line. Operation Lifesaver is a nationwide, nonprofit organization that provides public education programs to help prevent collisions, injuries, and fatalities at highway/rail grade crossings.	No

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?

3.17 Vessel Traffic	Increased vessel traffic related to the proposed action could result in the potential for increased incidents compared to the no-action alternative, although the overall risk would remain relatively low.	• Due to sensitivity of the local environment, tribal resources, and the potential presence of special-status species, to reduce potential risk of incident due to loss of propulsion, loss of steering, grounding, or severe weather, the applicant will not receive or load crude oil to tankers or tank barges unless the vessels have tug escorts through Grays Harbor as described below. This requirement will remain in place until rules are implemented pursuant to Engrossed Substitute House Bill 1449, Section 12, at which time the rules will apply to the project. At least one escort tug must accompany a laden tanker or tank barge carrying oil between the Hoquiam River and Grays Harbor entrance, and two tugs (one escort tug and one assist tug) must assist the vessel during mooring procedures.
		  ◦ For laden tankers, the escort tug must be appropriately tethered while transiting Grays Harbor.
		  ◦ Escort tugs must have an aggregate shaft horsepower equivalent to at least 5% of the deadweight tons of the escorted oil tanker or tank barge.
		  ◦ Escort tugs must have sufficient mechanical capabilities to provide for safe escort.
		• To ensure adequate safety for tug operations and thereby reduce the risk of an incident, the applicant will not receive or load crude oil to tankers or tank barges unless the vessels supply Grays Harbor pilots and tug companies with bollard pull capacities of the vessels prior to entering Grays Harbor.
		• To reduce potential risk of incident of vessel collision or allision in Grays Harbor, the applicant will work with U.S. Coast Guard, Ecology, Port of Grays Harbor, and Grays Harbor Safety Committee to propose, develop, and implement a formal vessel management system. The vessel management system will include the ability to schedule, track, and monitor vessel movements in the harbor and off the entrance to the harbor.
			No

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?

		The vessel management system will be active prior to the applicant beginning the proposed operations.
		- To reduce potential risk of incident of vessel collision while in Grays Harbor, the vessel management system will take the following actions.
		  - Ensure vessel traffic is limited while a laden tank vessel is in the navigation channel.
		  - Prohibit the transit of any other deep-draft vessels within the south channel (just off Westport) to Terminal 1 in both directions whenever a laden tank vessel is transiting within the same channel.
		  - Include real-time automatic identification system tracking and monitoring.
		- To reduce the risk of an incident, the applicant will coordinate with the Port of Grays Harbor and as a member of the Grays Harbor Safety Committee, work to develop and implement specific procedures for escorting, tethering, and emergency maneuvering to control laden tank vessels. The procedures must be drafted prior to the proposed operations beginning. These procedures should be included in the Grays Harbor Safety Plan. At a minimum, these must include the following elements.
		  - Escort configurations and maneuvering characteristics of escorted tankers and tank barges.
		  - Specific emergency connection and tethering procedures for connection of tugs to tankers and tank barges.
		  - Specific maneuvers necessary for the tug to maintain control of the tanker while transiting Grays Harbor waters specifically during incidents of loss of propulsion or steering or in bad weather.
		  - Appropriate safe speed of transit in Grays Harbor when tugs are tethered.	

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?
		¡ Guidelines for tanker or tank barge bridge team to rapidly recognize and respond to a loss of power or steering. By improving recognition and reaction time, the tug can more effectively steer the vessel through the navigation channel upon incident. ¡ Requirement for a pretransit conference. ¡ Requirements for refueling of the vessel. ı While commercial fishing boats are required to follow the U.S. Coast Guard navigation rules, to improve awareness of vessel traffic in the navigation channel, the applicant will work with the Grays Harbor Safety Committee, including the U.S. Coast Guard and Port of Grays Harbor, to establish procedures to announce project related vessel traffic arrivals and departures over a designated VHF marine radio channel.	
4.4, Environmental Health Risks-Terminal (Onsite)	The proposed action could result in increased potential for an incident involving a spill, fire, or explosion of bulk liquids, including crude oil, during onsite operations compared to the no-action alternative although the overall risks of large spills would remain relatively low.	ı To reduce the impacts from an oil spill, the applicant will establish and implement a procedure for blocking all drains on the dock prior to oil transfers and observing the area for discharges before removal. ı To improve oil recovery in the case of a spill during vessel loading at the dock, the applicant will retain a licensed engineer to perform an independent engineering analysis and feasibility study to determine the number of days it is safe and effective to preboom oil transfers and to identify site-specific improvements to maximize successful prebooming. The applicant will ensure the study is submitted to Ecology for review. If approved, Ecology will amend the applicant's oil spill contingency to require prebooming and improvements consistent with the study. If improvements to allow for pre-booming are determined to be unfeasible by Ecology and until changes are in place, the applicant will implement alternative measures, including but not limited to the following (in addition to those already	Yes

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?
		required by regulation) to mitigate the absence of preventative boom in the water during transfers: stage dedicated response vessels, additional containment and clean-up equipment, and trained personnel at the terminal dock and/or at a nearby staging area during oil transfers. At a minimum, this alternative must include the following elements. ¡ One oil spill response vessel with crew, skimmer, and at least 1,000 feet of boom at the dock. ¡ On-water tank barge storage devices (not including bladders) prestaged at the dock with the skimmer to ensure a minimum of 450 barrels of recovery ready to be deployed. l To reduce the risk of a spill, the applicant will require the facility person-in-charge (certified facility operator for oil transfers) to verify all connections are properly functioning for each oil transfer prior to the commencement of a transfer. l To prepare for spills, the applicant will fully comply with Washington State contingency planning standards in place of any alternative measures previously approved in the oil spill contingency plan. l To reduce the risks and impacts from an oil spill, prior to beginning the proposed operations, the applicant will conduct a study to identify an appropriate level of financial responsibility for the potential costs for response and cleanup of oil spills, natural resource damages, and costs to state and affected counties and cities for their response actions. The study should address the factors in Revised Code of Washington 88.40.025, Evidence of Financial Responsibility for Onshore or Offshore Facilities, including a reasonable worst-case spill volume, the cost of cleaning up the spilled oil, the frequency of operations at the facility, prevention measures employed by the facility that could reduce impacts through spill containment,	

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?
		immediate discovery, and shutoff times, and the damages that could result from the spill (including restoration). The study should identify any constraints related to the commercial availability and affordability of financial responsibility. Based on the study, Ecology shall determine the appropriate level of financial responsibility and require the applicant to demonstrate their financial responsibility to the satisfaction of Ecology. Proof of financial responsibility will be included as documentation in the applicant's contingency plan. - To improve preparedness for incidents, including oils spills, explosions, and fires, the applicant will ensure an emergency preparedness workshop is conducted prior to beginning project operations. The applicant will coordinate the workshop with Ecology. The workshop will be no more than 1 day in length and be held prior to beginning operations and annually thereafter. The initial workshop will focus on familiarizing local emergency responders, tribes, and communities with the contents of the Northwest Area Contingency Plan, the Grays Harbor and Chehalis Geographic Response Plans, other local response plans, the facility response plan, and the measures that are in place for a rapid and effective spill response. - To improve response times and communication in the event of an incident that could affect tribal resources, the applicant will include tribal contacts (names and/or phone numbers) in notification protocols in the oil spill contingency plan.	
4.5, Environmental Health Risks - Rail Transport	Increased rail transport related to the proposed action would increase the likelihood of an incident involving a spill, fire, or explosion of bulk liquids, including crude oil, along the PS&P rail line compared to the	- **Voluntary measure:** To reduce potential risk from tank car punctures and spills identified with use of DOT-111 tank cars for transport of Bakken crude oil, the applicant will not accept crude oil by rail unless the following actions occur. - The rail cars meet or exceed the new U.S. Department of Transportation specification 117 design or performance criteria.	Yes

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?
	no-action alternative although the overall risks of large spills would remain relatively low.	¡ Existing tank cars are retrofitted in accordance with the U.S. Department of Transportation-prescribed retrofit design or performance standard (80 *Federal Register* 26643). I To improve the safe transport of crude oils with different volatilities and sinking tendencies, the applicant will not accept crude oil by rail unless the following actions have occurred. ¡ The applicant has received verification that a sample of the oil has been tested and properly classified and characterized. ¡ Where classification and characteristics of the oil are available in advance, the applicant has fully described this information and the implications for emergency response in its oil spill contingency plan. I To reduce risks of a spill due to a rail incident, the applicant will not accept crude oil unit trains by rail unless the train has in place a functioning two-way end-of-train device or distributed power for operations on the PS&P rail line to the local yard.	
4.5, Environmental Health Risks - Rail Transport	Increased rail traffic related to the proposed action would result in increased potential for environmental damage from an incident involving the spill of crude oil compared to the no-action alternative although the overall risks of large spills would remain relatively low.	I Due to sensitivity of the local environment, tribal resource concerns, and the potential presence of special-status species, to improve coordination and response capabilities in the event of a rail accident, the applicant will not accept crude oil by rail unless PS&P prepares, submits to Ecology for approval, and implements a contingency plan meeting the requirements identified below. This requirement will remain in place until state contingency plan requirements for railroads are implemented by Ecology pursuant to ESHB 1449, Section 5, and/or amendments to the federal oil spill response plan rule (49 Code of Federal Regulations 130) is adopted. ¡ Disclose full details of the method of response to spills to various sizes.	Yes

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?
		¡ Define a worst-case spill planning volume. ¡ Identify response notification and coordination procedures. ¡ Identify personnel assigned to implement the plan. ¡ Reference applicable Washington State geographic response plans. ¡ Describe a training and exercise program for personnel and equipment. ¡ Identify prepositioned spill containment and cleanup equipment and trained personnel. ¡ Identify arrangement for enlisting qualified and trained cleanup personnel to implement the plan. ¡ Describe how plan relates to other relevant contingency plans, such as facility plans, other rail plans, including federal oil spill response plans, and regional plans. l To improve first response effectiveness and safety, the applicant will consult with the Olympic Region Clean Air Agency and U.S. Environmental Protection Agency to identify air monitoring equipment needs for public health and safety in the case of a spill or explosion. The applicant will ensure equipment identified that is necessary for determining air quality conditions but not available through local agencies or fire departments will be made available to local fire departments.	

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?

4.5, Environmental Health Risks - Rail Transport	The proposed action would result in increased potential for environmental damage from an incident involving the spill of crude oil compared to the no-action alternative that would exceed the capacity of local emergency service response services.	- To increase the timeliness of responses to spills and incidents involving trains and to maximize coordination of responses along the PS&P rail line, the applicant will not accept crude oil by rail unless the following measures are completed.
		  - PS&P participates with the local fire districts in a public safety drill at least once every 2 years.
		  - PS&P tests one geographic response plan strategy annually and invites Ecology to participate.
		  - PS&P participates in testing the applicant's oil spill contingency plan with a rail scenario at least once every 3 years, including participating in at least one drill every 3 years. This drill will be designed with Ecology and scheduled on the regional drill calendar.
		- To improve response capability for spills that may occur on the Chehalis River, the applicant will coordinate with Ecology to advertise and extend registration of Vessels of Opportunity to the Chehalis River and to tribal boat owners prior to beginning operations. Applicants for the Vessel of Opportunity Program should be directed to www.oilspills101.wa.gov for information and registration.
		- To improve response capability for trains transporting product to the project site, the applicant will not accept crude oil until a foam truck has been provided to the Elma Fire Department to provide fire-fighting capability along the PS&P rail line. The foam truck must be available and operational prior to beginning operations. The applicant will consult with Ecology and the local fire department to determine the capacity of the foam truck.
		- To improve response times to reduce the initial impacts of an oil spill, the applicant will ensure that two trailers containing the spill response equipment listed below are available prior to beginning crude oil operations for use by initial local and
			Yes

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?

		emergency responders along the PS&P rail line. This equipment will be offered to fire departments along the PS&P rail line and the Chehalis Indian Tribe. The trailer and equipment will be maintained by the applicant and inspected annually. The equipment will only be provided to fire departments and Chehalis Tribe if they agree to store the equipment in a secure location and ensure the equipment used by appropriately trained personnel. The applicant will work with Ecology and local emergency officials to update the Western Region Response List website (www.wrrl.us), any applicable spills response plans to address the emergency equipment caches, and to document notification protocols, necessary training, use of Personal Protective Equipment, and equipment deployment procedures.
		- Mobile trailers of a specific size to hold the below equipment:
		  - 3000 feet of river boom in 4-500 ft. sections and 5-200 ft. sections
		  - 5000 feet of sausage sorbent boom
		  - 30 kits - anchoring systems (anchors, lines, floats)
		  - 20 kits - shoreside anchoring systems
		  - 1 towing bridle
		  - 4 heaving lines
		  - 1 machete (or other vegetation cutting tool)
		  - 1 pair of bolt cutters
		  - 50 sandbags
		  - 1 roll plastic sheeting
		  - 4 each plywood sheets (4 ft. x 8 ft.)
		  - 500 feet 3/8" poly line
		  - PPE: coveralls or Tyvek ® disposable suits, gloves, outer (chemical-resistant and disposable) boots, safety glasses or chemical splash goggles, hard hats - sufficient for 5 people	

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?
		- To reduce risks related to an oil spill, the applicant will not accept crude oil by rail until PS&P meets with local emergency management officials to identify training needs for local responders who will respond to an emergency on the PS&P rail line. This effort will include development and execution of a training program to these responders to increase level of awareness and understanding of the hazards associated with an oil train incident. The training will include identification of notification protocols, use of Personal Protective Equipment, and equipment deployment procedures. This training will be completed before the applicant begins receiving oil trains and will be offered at least annually. - To improve response capability on the Confederated Tribes of the Chehalis Reservation lands in the case of an oil spill, the applicant will ensure that an annual 1-day hazard awareness oil spill training for identified Chehalis tribal members is provided, including conducting and inviting tribal members to participate in drills. - To improve response capability in the Grays Harbor area in the case of an oil spill, the applicant will ensure an annual one-day hazard awareness oil spill training is provided for identified Quinault Indian Nation tribal members, including conducting and inviting tribal members to participate in drills. - To increase the timeliness and maximize the coordination of responses to spills and incidents involving crude oil trains along the PS&P rail line, the applicant will ensure the Grays Harbor Local Emergency Planning Committee's emergency response plan is updated to address the applicant's operations. This information must be included prior to beginning operations.	

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?

4.6, Environmental Health Risks-Vessel Transport	Increased vessel transport related to the proposed action would increase the likelihood of an incident involving the spill of crude oil within Grays Harbor compared to the no-action alternative although the overall risks of large spills would remain relatively low	• Due to sensitivity of the local environment, tribal resource concerns, and the potential presence of sensitive species, to reduce potential risk of incident due to loss of propulsion, loss of steering, grounding, or severe weather, the applicant will not receive or load crude oil to tankers or tank barges, unless the vessels have tug escorts through Grays Harbor as described below. This requirement will remain in place until rules are implemented pursuant to ESHB 1449, Section 12, at which time the rules will apply to the project.
		  ◦ At least one escort tug must accompany a laden tanker or tank barge carrying oil between the Hoquiam River and Grays Harbor entrance, and two tugs (one escort tug and one assist tug) must assist the vessel during mooring procedures.
		  ◦ For laden tankers, the escort tug must be appropriately tethered while transiting Grays Harbor.
		  ◦ Escort tugs must have an aggregate shaft horsepower equivalent to at least 5% of the deadweight tons of the escorted oil tanker or tank barge.
		  ◦ Escort tugs will have sufficient mechanical capabilities to provide for safe escort.
		• To ensure adequate safety for tug operations and thereby reduce the risk of an incident, the applicant will not receive or load crude oil to tankers or tank barges unless the vessels supply Grays Harbor Pilots and tug companies with bollard pull capacities of the vessels prior to entering Grays Harbor.
		• To reduce potential risk of incident of vessel collision or allision in Grays Harbor, the applicant will work with the U.S. Coast Guard, Ecology, Port of Grays Harbor, and Grays Harbor Safety Committee to propose, develop, and implement a formal vessel management system. The vessel management system will include the ability to schedule, track, and monitor vessel
			Yes

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?
		movements in the harbor and off the entrance to the harbor. The vessel management system will be active prior to the applicant beginning the proposed operations. To reduce potential risk of incident of vessel collision while in Grays Harbor, the vessel management system should act as follows. - Ensure vessel traffic is limited while a laden tank vessel is in the navigation channel. - Prohibit the transit of any other deep-draft vessels within the South Reach of the navigation channel (just off Westport) to Terminal 1 in both directions whenever a laden tank vessel is transiting within the same channel. - Include real-time Automatic Identification System tracking and monitoring. - To reduce the risk of a fire or explosion from tank barges, the applicant will not receive or supply Bakken crude oil to tank barges unless the tank barges are able to inert their tanks when carrying Bakken crude oil. - To reduce the risk of an incident, the applicant will coordinate with the Port of Grays Harbor and as a member of the Grays Harbor Safety Committee, work to develop and implement specific procedures for escorting, tethering, and emergency maneuvering to control laden tank vessels. The procedures must be drafted prior to the proposed operations beginning. These procedures should be included in the Grays Harbor Safety Plan. At a minimum, these must include the following elements. - Escort configurations and maneuvering characteristics of escorted tankers and tank barges. - Specific emergency connection and tethering procedures for connection of tugs to tankers and tank barges.	

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?
		¡ Specific maneuvers necessary for the tug to maintain control of the tanker while transiting Grays Harbor waters specifically during incidents of loss of propulsion or steering. ¡ Appropriate safe speed of transit in Grays Harbor when tugs are tethered. ¡ Guidelines for tanker or tank barge bridge team to rapidly recognize and respond to a loss of power or steering. By improving recognition and reaction time, the tug can more effectively steer the vessel through the navigation channel upon incident. ¡ Requirement for a pretransit conference. ¡ Refueling operations. l To reduce the risk of an incident during vessel refueling, the applicant will ensure that any tank barges loaded with fuel for purposes of refueling vessels at the project site follow the navigation and safety mitigation measures for crude oil tank barges described in this section.	
4.6, Environmental Health Risks-Vessel Transport	Increased vessel traffic related to the proposed action would result in increased potential for environmental damage from an incident involving the spill of crude oil compared to the no-action alternative although the overall risks of large spills would remain relatively low.	l To improve response times and increase coordination of responses, the applicant will develop and implement a program approved by Ecology to educate its tankers and tank barge customers on the reporting requirements for vessel incidents resulting in a threat of a spill under Revised Code of Washington 88.46.100, Notification of Vessel Emergencies Resulting in Discharge of Oil, prior to beginning the proposed operations. l To improve response times and communication in the event of an incident that could affect commercial or recreational fishing, the applicant will develop a method for provide information on potential incidents to commercial and recreational fishing boats and will describe this measure in the oil spill contingency plan prior to beginning operations.	Yes

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?

6.5.1, Air (Cumulative Impacts)	Increased air emissions under cumulative conditions could exceed acceptable levels of nitrogen oxides and diesel particulate matter near Poynor Yard and at the project site.	- The applicant will ensure that all engine-powered equipment and vehicles used in construction, operation, and maintenance at the facility are subject to a regular inspection and maintenance schedule in order to minimize air pollutant emissions, greenhouse gas emissions, and fuel consumption. Preventive maintenance activities will include but not be limited to the following actions.
		  - Replacing oil and oil filters as recommended by manufacturer instructions.
		  - Maintaining proper tire pressure in on-road vehicles.
		  - Replacing of worn or end-of-life parts.
		  - Scheduling routine equipment service checks.
		- The applicant will develop and implement an anti-idling policy for both construction and operation and ensure that equipment operators receive training on best practices for reducing fuel consumption in order to reduce project-related greenhouse gas emissions. The anti-idling policy will include required warmup periods for equipment and prohibit idling beyond these periods. The policy will define any exemptions where idling is permitted for safety or operational reasons, such as when ambient temperatures are below levels required for reliable operation. In addition, the use of technologies such as idle management systems or automatic shutdown features will be considered part of the policy.
		  - In order to identify NOx emissions if the Westway, Imperium, and Grays Harbor Rail Terminal Projects are permitted, the applicant will ensure air monitoring stations are installed to monitor the NO_2 emissions at or near the facility prior to the third proposed facility beginning operations. Air monitoring reports will be submitted to Olympic Region Clean Air Agency annually. If levels are observed to be approaching the National Ambient Air
			No

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?

		Quality Standards, then additional measures could be required in the agency's air permit.
		- To monitor diesel particulate matter (DPM) emissions associated with rail operations at and near the project site, the applicant will ensure a DPM monitoring station is installed prior to beginning operations. The applicant will ensure the DPM emission report is submitted to the City of Hoquiam annually. The City of Hoquiam will coordinate with the City of Aberdeen, Ecology, and the Olympic Region Clean Air Agency as applicable, to review the emission report. If DPM emissions are observed to approach levels of concern for sensitive receptors, then the City of Hoquiam will require the applicant to modify operations to reduce DPM emissions. These actions could include:
		  - Modifying or reducing switching operations between Poynor Yard and the project site to reduce DPM emissions during switching operations.
		  - Installing a commercial idle control retrofit device on switching locomotives to reduce DPM emissions from idling.
		  - Using Tier 3 or Tier 4 compliant[10] switching engines at Poynor Yard.
		- To reduce greenhouse gas emissions, DPM, and other air pollutants from the locomotives, idling will be minimized to the maximum extent practicable. Shutting down locomotive engines as soon as practicable when not in use and delaying restart until necessary for car switching or departure from the facility would reduce these pollutants.	

[10] These refer to standards for implementing the Environmental Protection Agency's program to improve locomotive efficiency to reduce emission of particulate matter and nitrous oxides.

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?
		- In order to minimize idling from trains and vessels and resulting emissions, the Applicant will coordinate with the Port of Grays Harbor and PS&P to manage waiting times for rail and vessel arrivals or departures.	
Section 6.5.2, Noise and Vibration (Cumulative Impacts)	Increased noise, primarily related to train horns, under cumulative conditions could result in substantial noise increases along the PS&P rail line compared to the no-action alternative.	- To address increased noise from rail traffic, the applicant will coordinate with PS&P and interested communities along the PS&P rail line on the creation of quiet zones, if requested. Elimination of locomotive horn sounding at the affected grade crossings would eliminate and not just reduce increased horn noise. Quiet zones can only be established by public agencies using a procedure established in FRA regulations. This may include installation of enhanced safety measures at grade crossings such that train horns would not be required to be used. Implementation of a quiet zone is subject to FRA approval. Quiet zones include measures to maintain the level of safety while reducing noise.	Yes
Section 6.5.3, Tribal Resources (Cumulative Impacts)	Increased vessel traffic under cumulative conditions, could result in increased disruption of access to fishing areas by the Quinault Indian Nation compared to the no-action alternative.	- To mitigate potential impacts on tribal fishing, the applicant will coordinate with the Quinault Indian Nation and Washington Department of Fish and Wildlife, as requested, to support review and possible adjustments of docking schedules to minimize conflict with fishing schedules negotiated preseason by the state and tribe. Consultation will account for operations, including anticipated vessel movements related to the proposed action. - While tribal fishing boats are required to follow the U.S. Coast Guard navigation rules, to improve awareness of vessel traffic in the navigation channel, the applicant will work with the Grays Harbor Safety Committee, including the U.S. Coast Guard and Port of Grays Harbor, to establish procedures to announce project related vessel traffic arrivals and departures over a designated VHF marine radio channel.	Yes

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?
		- To mitigate impacts on access to tribal treaty fishing areas, the applicant will initiate a process between stakeholders and Quinault Indian Nation tribal officials to discuss and identify additional mitigation measures such as, adjusting the timing of vessel calls during peak fishing seasons. Initiation of the process between the parties will occur before vessel operations begin.	
Section 6.5.5, Vehicle Traffic and Safety (Cumulative Impacts)	Increased rail traffic under cumulative conditions could result in substantial increases in vehicle delay and emergency service access at the Olympic Gateway Plaza and between Poynor Yard and the project site compared to the no-action alternative. There would also be an increased possibility of vehicle accidents along the PS&P rail line.	- To mitigate vehicle traffic impacts associated with rail operations of the proposed action, the applicant will work with the City of Hoquiam, City of Aberdeen, Port of Grays Harbor, Grays Harbor Council of Governments, and PS&P to address vehicle delay and/or inform motorists of potential blockages at PS&P grade crossings between the project site and Poynor Yard. WSDOT, the City of Hoquiam, City of Aberdeen, and Port of Grays Harbor will approve proposed measures for the areas where they are responsible for vehicle safety. The applicant will ensure measures are in place prior to beginning operations. The proposed changes should include an evaluation of impacts on potentially affected low-income and minority populations. - To mitigate vehicle traffic impacts associated with rail operations related to the proposed action, the applicant will work with the City of Hoquiam, City of Aberdeen, Port of Grays Harbor, Grays Harbor Council of Governments, and PS&P to address vehicle delays and/or inform motorists of potential blockages at PS&P grade crossings into and out of the Olympic Gateway Plaza. WSDOT, the City of Hoquiam, City of Aberdeen, and Port of Grays Harbor will approve proposed measures for the areas where they are responsible for vehicle safety. The applicant will ensure acceptable measures are in place prior to beginning project operations. The proposed changes should	Yes

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?
		include an evaluation of impacts on potentially affected low-income and minority populations. - To reduce the potential for increased delay of emergency vehicles at PS&P grade crossings during project operations, the applicant will work with local emergency service providers to provide advance notification of incoming trains. - To ensure that local emergency service providers have access to areas south of the PS&P rail line in Aberdeen, the applicant will ensure an automobile with an 8-foot clearance and a combination truck (pumper and ambulance) are available for staging south of the PS&P rail line in the Olympic Gateway Plaza for use by local emergency service providers. The applicant will also ensure an ambulance is available for staging south of PS&P rail line in the Port of Grays Harbor area between the project site and Port Industrial Road for use by emergency service providers. These measures will be in place prior to beginning crude oil operations. To address the potential for emergency access conflicts to areas along the PS&P rail line during unplanned unit train stoppages, the applicant will work with PS&P and local emergency service providers along the PS&P rail line to develop and implement a notification protocol to inform local emergency service providers and other interested parties of the duration and magnitude of the unplanned stoppages. The notification protocol will be in place prior to the beginning of operations involving transport of crude oil. - To address potential vehicle safety impacts, each of the public at-grade crossings on the rail line, the applicant will work with PS&P to provide permanent signs that prominently display both a toll-free telephone number and a unique grade-crossing identification number in compliance with Federal Highway Administration regulations (23 Code of Federal Regulations 655). The toll-free number would enable drivers to report	

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?
		promptly any accidents, malfunctioning warning devices, stalled vehicles, or other dangerous conditions. The signs will be in place prior to the beginning of operations involving transport of crude oil. - To address potential vehicle safety impacts, the applicant will coordinate with PS&P to make Operation Lifesaver educational programs available to communities, schools, and other organizations located along the rail line. Operation Lifesaver is a nationwide, nonprofit organization that provides public education programs to help prevent collisions, injuries, and fatalities at highway/rail grade crossings.	

Section 6.5.7, Environmental Health and Safety (Cumulative Impacts)	Under cumulative conditions, there could be an increase in the likelihood of incidents involving a spill, fire, or explosion of bulk liquids, including crude oil, compared to the no-action alternative. Although the overall risks would remain relatively low, the potential environmental damage would be significant.	- Due to sensitivity of the local environment, tribal resources, and the potential presence of special-status species, to reduce potential risk of incident due to loss of propulsion, loss of steering, grounding, or severe weather, the applicant will not receive or load crude oil to tankers or tank barges unless the vessels have tug escorts through Grays Harbor as described below. This requirement will remain in place until rules are implemented pursuant to ESHB 1449, Section 12, at which time the rules will apply to the project.
		  - At least one escort tug must accompany a laden tanker or tank barge carrying oil between the Hoquiam River and Grays Harbor entrance, and two tugs (one escort tug and one assist tug) must assist the vessel during mooring procedures.
		  - For laden tankers, the escort tug must be appropriately tethered while transiting Grays Harbor.
		  - Escort tugs must have an aggregate shaft horsepower equivalent to at least 5% of the deadweight tons of the escorted oil tanker or tank barge.
		  - Escort tugs must have sufficient mechanical capabilities to provide for safe escort.
			Yes

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?
		¡ To ensure adequate safety for tug operations and thereby reduce the risk of an incident, the applicant will not receive or load crude oil to tankers or tank barges unless the vessels supply Grays Harbor pilots and tug companies with bollard pull capacities of the vessels prior to entering Grays Harbor. l To reduce potential risk of incident of vessel collision or allision in Grays Harbor, the applicant will work with the U.S. Coast Guard, Ecology, Port of Grays Harbor, and Grays Harbor Safety Committee to propose, develop, and implement a formal vessel management system. The vessel management system will include the ability to schedule, track, and monitor vessel movements in the harbor and off the entrance to the harbor. The vessel management system will be active prior to the applicant beginning operations. l To reduce potential risk of incident of vessel collision while in Grays Harbor, the vessel management system will take the following actions. ¡ Ensure vessel traffic is limited while a laden tank vessel is in the navigation channel. ¡ Prohibit the transit of any other deep-draft vessels within the South Reach of the navigation channel (just off Westport) to Terminal 1 in both directions whenever a laden tank vessel is transiting within the same channel. ¡ Include real-time automatic identification system tracking and monitoring. l To reduce the risk of a fire or explosion from tank barges, the applicant will not receive or supply Bakken crude oil to tank barges unless the tank barges are able to inert their tanks when carrying Bakken crude oil. l To reduce the risk of an incident, the applicant will coordinate with the Port of Grays Harbor and as a member of the Grays	

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?
		Harbor Safety Committee, work to develop and implement specific procedures for escorting, tethering, and emergency maneuvering to control laden tank vessels. The procedures must be drafted prior to operations beginning. These procedures should be included in the Grays Harbor Safety Plan. At a minimum, these must include the following elements. - Escort configurations and maneuvering characteristics of escorted tankers and tank barges. - Specific emergency connection and tethering procedures for connection of tugs to tankers and tank barges. - Specific maneuvers necessary for the tug to maintain control of the tanker while transiting Grays Harbor waters specifically during incidents of loss of propulsion or steering or in bad weather. - Appropriate safe speed of transit in Grays Harbor when tugs are tethered. - Guidelines for tanker or tank barge bridge team to rapidly recognize and respond to a loss of power or steering. By improving recognition and reaction time, the tug can more effectively steer the ship through the navigation channel upon incident. - Requirement for a pretransit conference. - Requirements for refueling of the vessel. - To improve response times and increase coordination of responses, the applicant will develop and implement a program approved by Ecology to educate its tankers and tank barge customers on the reporting requirements for vessel incidents resulting in a threat of a spill under Revised Code of Washington 88.46.100, Notification of vessel emergencies resulting in discharge of oil, prior to beginning operations. - To improve response times and communication in the event of an incident that could affect commercial or recreational fishing,	

Environmental Resource	What is the potential impact that requires mitigation?	What are the applicant measures that would address these impacts?	Were potential unavoidable and significant adverse environmental impacts identified in the Draft EIS?
		the applicant will develop a method for provide information on potential incidents to commercial and recreational fishing boats and will describe this measure in the oil spill contingency plan prior to beginning operations. - To reduce the risk of an incident during vessel refueling, the applicant will ensure that any tank barges loaded with fuel for purposes of refueling vessels at the project site follow the navigation and safety mitigation measures for crude oil tank barges described in this section.	
7.0 Economics, Social Policy, Cost Benefit Analysis	Implementation of the proposed action could result in an increased need to establish ways to provide and share information with the public, tribes, and City of Hoquiam.	- The applicant will appoint a community liaison to consult with affected communities, businesses, and agencies; develop cooperative solutions to address local concerns; be available for public meetings; and conduct periodic public outreach. The applicant will provide the name, telephone number, and email address of the community liaison to mayors and other local officials in each community through which the PS&P rail line passes. - The applicant will appoint a tribal liaison to assist in addressing issues of concerns to federally recognized tribes; develop cooperative solutions to tribal concerns; be available for tribal meetings; and conduct periodic outreach. The applicant will provide the name, telephone number, and email address of the tribal liaison to officials of each tribe that wish to be notified. - The applicant will submit quarterly reports to the City of Hoquiam on the progress of, implementation of, and compliance with all mitigation measures. The reporting period for these reports will begin the first quarter after permit issuance and continue quarterly through the first year of project operations after which the applicant will submit a report annually through the first 5 years of operation.	No

IMPERIUM TERMINAL SERVICES EXPANSION PROJECT
DRAFT ENVIRONMENTAL IMPACT STATEMENT

City of Hoquiam
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Hoquiam, WA 98550

Washington State Department of Ecology
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August 2015

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Acronyms and Abbreviations

°C	degrees Celsius
°F	degrees Fahrenheit
$\mu g/m^3$	micrograms per cubic
AGP	Ag Processing, Inc.
ALLSITES	Facility/Site Identification System Listing
AMC	Aberdeen Municipal Code
API	American Petroleum Institute
applicant	Imperium Terminal Services
ASIL	accep source impact level
ATB	articulated tug-barge
BMP	best management practice
BNSF	BNSF Railway
Btu	British thermal unit
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS	Federal Comprehensive Environmental Response, Compensation, and Liability Information System
CFR	Code of Federal Regulations
cfs	cubic feet per second
Chehalis	Confederated Tribes of the Chehalis Reservation
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CSCSL NFA	Confirmed and Suspected Contaminated Sites – No Further Action
CSZ	Cascadia Subduction Zone
CTC	centralized traffic control
CWCOG	Cowlitz-Wahkiakum Council of Governments
DAHP	Washington State Department of Archaeology & Historic Preservation
dBA	A-weighted decibels
DNL	day-night sound level
DPM	diesel particulate matter
DPS	distinct population segment
Draft EIS	draft environmental impact statement
Ecology	Washington State Department of Ecology
EIS	environmental impact statement
EPA	U.S. Environmental Protection Agency

ESA	Endangered Species Act
ESHB	Engrossed Substitute House Bill
FEMA	Federal Emergency Management Agency
FINDS	Facility Index System/Facility Registry System
FR	Federal Register
FRA	Federal Railroad Administration
FRA/FTA Manual	Transit Noise and Vibration Impact Assessment
FTA	Federal Transit Administration
g	gravity
GHCOG	Grays Harbor Council of Governments
GHG	greenhouse gas
GIS	geographic information system
GMA	Growth Management Act
GRP	geographic response plan
HMC	Hoquiam Municipal Code
Hz	hertz
IMPLAN	Impact Analysis for Planning Model
IPCC	Intergovernmental Panel on Climate Change
kg CO_2 per mmBtu	kilograms of carbon dioxide per million British thermal unit
kHz	kilohertz
Ldn	day-night sound level
LEED	Leadership in Energy and Environmental Design
Leq	equivalent sound level
Leq[h]	hourly equivalent sound level
LOS	level of service
LUST	Leaking Underground Storage Tank
MANIFEST	Hazardous Waste Manifest Information
MHHW	mean higher high water
MLLW	mean lower low water
$MMTCO_2e$	million metric tons of carbon dioxide equivalent
MP	milepost
mph	miles per hour
N_2O	nitrous oxide
NAAQS	national ambient air quality standards
NEPA	National Environmental Policy Act
NFIP	National Flood Insurance Program
NIMS	National Incident Management System
nm	nautical miles
NO_2	nitrogen dioxide

NOAA	National Oceanic and Atmospheric Administration
NO_x	nitrogen oxide
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O_3	ozone
OPA 90	Oil Pollution Act of 1990
PGA	peak ground acceleration
PHMSA	Pipeline and Hazardous Materials Safety Administration
PM10	particulate matter with a diameter of 10 micrometers or less
PM2.5	particulate matter with a diameter of 2.5 micrometers or less
Port	Port of Grays Harbor
ppb	parts per billion
ppm	parts per million
PS&P	Puget Sound & Pacific Railroad
PUD	Public Utility District
QIN	Quinault Indian Nation
Quinault	Quinault Indian Nation
RCRA	Resource Conservation and Recovery Act Information
RCW	Revised Code of Washington
SEL	sound exposure level
SEPA	State Environmental Policy Act
SMA	Shoreline Management Act
SO_2	sulfur dioxide
SOSC	State-On-Scene Coordinator
SQG	small quantity generator
SR	State Route
SR 105	State Route 105
SR 109	State Route 109
SR 507	State Route 507
SR 520	State Route 520
TMDL	Total Maximum Daily Load
TPC	train performance calculator
U.S.C	United States Code
UP	Union Pacific
US 101	US Highway 101
US 12	US Highway 12
US 2	US Route 2
USACE	U. S. Army Corp of Engineers
USCG	U.S. Coast Guard

USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
VCP	Voluntary Cleanup Program
VdB	velocity decibels
VHF	very high frequency
VOC	volatile organic compound
WAC	Washington Administrative Code
WDFW	Washington Department of Fish and Wildlife
WISAARD	Washington Information System for Architectural and Archaeological Records Database
WNHP	Washington Natural Heritage Program
WRIA	Watershed Resources Inventory Area
WSDOT	Washington State Department of Transportation
WUTC	Washington Utilities and Transportation Commission

Chapter 1
Introduction

1.1 What is the proposed action?

Imperium Terminal Services (applicant) is proposing to expand its existing biodiesel production and transport facility by developing an additional 10.9 acres of its 22.9-acre site to handle (unload and load) and store bulk liquids—crude oil, ethanol, naphtha, gasoline, vacuum gas oil, jet fuel, no. 2 fuel oil, no. 6 fuel oil, kerosene, renewable jet fuel, renewable diesel, used cooking oil, and animal fat (proposed action), in addition to currently permitted liquids, including biodiesel, petroleum diesel, vegetable oil, and methanol. These liquids would either be used for biodiesel production or handled and stored for offsite transport in either the existing or proposed facilities. It is anticipated that these bulk liquids would be transported to and from the project site primarily by rail and vessel.

At full build-out, the expansion would enable the applicant to receive approximately 1.26 billion gallons (30 million barrels) of bulk liquids[1] per year and store an additional 30.2 million gallons (720,000 barrels). The proposed action would include constructing up to nine storage tanks, each with a capacity of 3.36 million gallons (80,000 barrels) tanks and the pumps and pipelines required to connect the tanks to the expanded on-site rail loading and unloading area and the vessel loading and unloading area at the Port of Grays Harbor (Port) Terminal 1 dock.

Chapter 2, *Proposed Action and Alternatives*, provides a detailed description of the existing and proposed facilities and operations at the project site.

1.2 Why was this document prepared?

This draft environmental impact statement (Draft EIS) addresses the environmental impacts associated with the proposed action. The Draft EIS is being prepared under the Washington State Environmental Policy Act (SEPA) Chapter 43.21C of the Revised Code of Washington [RCW]), the SEPA Rules (WAC 197-11), and the City of Hoquiam Municipal Code (HMC) 11-10.

The proposed action triggers SEPA review, because it requires state and local permits. The Draft EIS supports decisions regarding the issuance of these permits. The Washington State Department of Ecology (Ecology) and City of Hoquiam are serving as co-lead agencies in the development of the Draft EIS.

The co-lead agencies issued a determination of significance on April 4, 2014, and requested public and agency comments on the scope of the Draft EIS. The Draft EIS scoping period concluded on May 27, 2014 (scoping comments are included in Appendix A, *Scoping Report*). The co-lead agencies established the scope of the Draft EIS based, in part, on comments received during the scoping period, and identified elements of the environment that should be addressed in the Draft EIS. Accordingly, this Draft EIS addresses the potential impacts on earth; air; water; plants; animals; energy and natural resources; noise and vibration; land and shoreline use; aesthetics, light and glare; recreation; historic and cultural resources; tribal resources; public services and utilities;

[1] This amount includes existing and proposed bulk liquids.

hazardous materials; rail traffic; vehicle traffic and safety; vessel traffic; and environmental health. The Draft EIS also considers economics, social policy, and the costs and benefits of the proposed action consistent with HMC 11.10.160.

1.3 How is this document organized?

The remainder of this Draft EIS is organized as follows.

Chapter 2, Proposed Action and Alternatives. Chapter 2 provides a description of the proposed action (project location and existing and proposed facilities and operations), construction schedule and methods, and the no-action alternative.

Chapter 3, Affected Environment, Impacts, and Mitigation. Chapter 3 describes existing conditions in the study area, environmental impacts that would likely result from the proposed action and no-action alternative, and any measures to mitigate impacts of the proposed action. The chapter is subdivided into 17 sections, with each section addressing one element of the environment and the potential impacts related to construction and routine operations. Section 3.0, *Introduction*, provides an overview of the scope and approach to completing the analysis of impacts.

- 3.0 Introduction
- 3.1 Earth
- 3.2 Air
- 3.3 Water
- 3.4 Plants
- 3.5 Animals
- 3.6 Energy and Natural Resources
- 3.7 Noise and Vibration
- 3.8 Land and Shoreline Use
- 3.9 Aesthetics, Light, and Glare
- 3.10 Recreation
- 3.11 Historic and Cultural Preservation
- 3.12 Tribal Resources
- 3.13 Public Services and Utilities
- 3.14 Hazardous Materials
- 3.15 Rail Traffic
- 3.16 Vehicle Traffic and Safety
- 3.17 Vessel Traffic

Chapter 4, Environmental Health and Safety. In addition to potential impacts associated with routine operations, the proposed action could result in impacts from potential accidents (e.g., storage tank failures, train derailments, vessel collisions) and related consequences (e.g., oil spills).

Chapter 4 addresses the impacts of these risks and consequences in the study area. This section also includes a discussion of the regulatory framework for spill prevention and preparedness and emergency service response, and identifies any additional measures that would be required to mitigate the impacts of the proposed action.

Chapter 5, Extended Rail and Vessel Transport. Chapter 5 addresses the impacts associated with transporting bulk liquids beyond the study areas addressed in Chapters 3 and 4. In the near future, it is expected this would most likely entail the transport of Bakken crude oil to the project site by rail from the Intermountain Region and Central United States, and transport of Bakken crude oil from the project site by tank vessel to refineries on the West Coast. However, transport could vary depending on the commodity being transported and the volume, source, and final market for delivery. This chapter addresses the potential impacts on the environment within these areas.

Chapter 6, Cumulative Impacts. Chapter 6 addresses the potential impacts of the proposed action when considered in combination with all other past, present, and reasonably foreseeable future projects.

Chapter 7, Economics, Social Policy, and Cost-Benefit Analysis. As required by the City of Hoquiam Municipal Code 11.10.160, Chapter 7 addresses economics, social policy, and the costs and benefits related to the proposed action. Because the cost-benefit analysis informs the City's decision regarding issuance of the land use permits, the scope of the analysis is limited to potential costs and benefits to the residents of Hoquiam.

Chapter 8, Distribution List. Chapter 8 lists the individuals, agencies, and companies that have received a copy of the Draft EIS.

Chapter 9, References. Chapter 9 lists the references cited in the Draft EIS.

Chapter 2
Proposed Action and Alternatives

This chapter describes the proposed action (project location and existing and proposed facilities and operations), construction schedule and methods, and the no-action alternative.

2.1 What is the proposed action?

Imperium Terminal Services (applicant) is proposing to expand its existing biodiesel production and transport facility by developing an additional 10.9 acres of its 22.9-acre site to handle (load and unload), store, and use additional bulk liquids (proposed action). The following additional bulk liquids would be permitted under the proposed action: crude oil, ethanol, naphtha, gasoline, vacuum gas oil, jet fuel, no. 2 fuel oil, no. 6 fuel oil, kerosene, renewable jet fuel, renewable diesel, used cooking oil, and animal fat, in addition to currently permitted liquids, including biodiesel, petroleum diesel, vegetable oil, and methanol. These liquids would be used in the existing biodiesel production facilities[1] by the applicant or unloaded, stored in the existing or proposed facilities, and loaded for offsite transport on behalf of the applicant's future customers. It is anticipated that these bulk liquids would be transported to and from the project site primarily by rail and vessel.

2.1.1 Project Location

The proposed action would occur at the applicant's existing facility (project site) located[2] at Terminal 1 of the Port of Grays Harbor (Port) in Hoquiam, Washington, north of the confluence of the Chehalis River and Grays Harbor (Figure 2-1). The project site covers approximately 22.9 acres, 12 of which the applicant operates as a biodiesel production and transport facility.

[1] The handling, storing, and use of materials used for biodiesel production are discussed in detail in Section 2.1.2.2, *Existing Operations*.

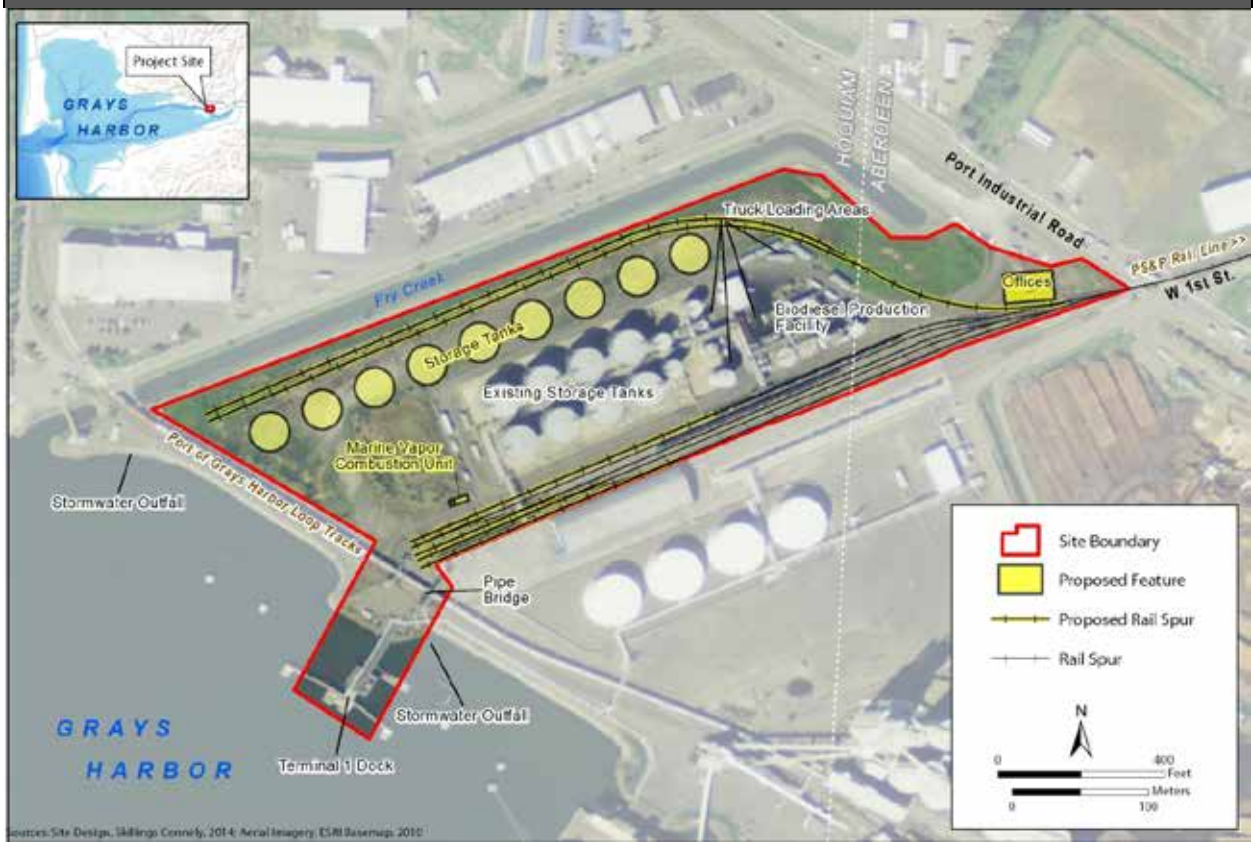
[2] Tax Assessor's Parcel Information: City of Hoquiam in Section 18, Township 17, Range 9 West, North of the Willamette Meridian, Tax Parcel Number #056402300000; and City of Aberdeen in Section 7, Township 17, Range 9 West, North of the Willamette Meridian, Tax Parcel Number #029902000200.
Latitude: 46.968253, longitude: -123.855871.

Figure 2-1. Project Location

Local road access to the project site is provided via Port Industrial Road at the intersection with West 1st Street. Regional highway connections are accessible within a few miles of the project site by US Route 12 (US 12), which runs east, and US Route 101 (US 101), which runs north and south.

Rail access to the project site is provided by the Puget Sound & Pacific Railroad (PS&P), which is owned and operated by Genesee and Wyoming, Inc. The line extends 59 miles from Centralia to Hoquiam. Trains arriving at and departing from the project site must travel along the PS&P rail line before connecting with either the BNSF Railway (BNSF) or Union Pacific Railroad in Centralia. The PS&P rail line largely parallels US 12 from Centralia into Aberdeen, where it generally parallels the Chehalis River before terminating at the Port's loop tracks (Figure 2-2). No changes to the PS&P rail line would occur as part of the proposed action.

Figure 2-2. Project Site



Tank vessels[3] approach the project site via the Grays Harbor Navigation Channel, which runs from the mouth of Grays Harbor to the Port docks. Tank vessels calling at the project site typically berth at the Port's Terminal 1 dock. The project site also has access to the Terminal 2 facilities; however, Terminal 2 is frequently used by other Port tenants, which limits the terminal's availability for additional vessels. Therefore, loading vessels would occur under the proposed action at Terminal 1 and Terminal 2 is not considered as part of the proposed action.

2.1.2 Existing Facilities and Operations

The applicant currently produces biodiesel at the project site, which involves receiving, storing, loading (for transport), and combining various materials, including vegetable oil, methanol, diesel, glycerin, and biodiesel. Biodiesel and vegetable oil are considered to be oil as defined by the state (Revised Code of Washington [RCW] 90.56.010(17)6), which means the applicant's facility is already regulated as an oil-handling facility. Additional materials used in the production of biodiesel are discussed in this section.

[3]The term *tank vessel* refers to a marine vessel used to transport bulk liquids such as crude oil; it includes tankers (self-propelled ships) and tank barges (barges propelled by tugs).

2.1.2.1 Existing Facilities

The existing facilities, constructed in 2007, include the biodiesel production facility, bulk liquid storage tanks, loading and unloading areas, a system of pipelines connecting these areas with bulk liquid storage tanks and the biodiesel production facility, and buildings to house the laboratory, offices, and conference rooms (Figure 2-2).

Biodiesel Production Facilities

The biodiesel production facilities are located on the eastern end of the project site and include a motor control room, a distributed control system room, a filter press building, pumps, heat exchangers, an oil dryer, decanters, reactors, a distillation column, cooling towers, condensers, a hot oil heater, media filters, and sump pumps.

Storage Tanks

There are 16 aboveground storage tanks at the project site; they are located at the center of the project site (Figure 2-2).

- Eight large tanks are used to store biodiesel or vegetable oil. Each tank is approximately 80 feet wide and 60 feet tall with the capacity to hold up to 2 million gallons. Each of these tanks is supported by a 3.5-foot-thick concrete foundation and 185 piles (16-inch-diameter grout driven piles) driven into the ground to a depth of approximately 75 feet.[4]
- Eight smaller tanks are located east of the large tanks:
  - Two 500,000-gallon storage tanks for storing vegetable oil, biodiesel, or glycerin.
  - One 300,000-gallon tank for storing glycerin.
  - One 500,000-gallon tank for storing methanol.
  - One 100,000-gallon tank for storing sodium methylate.
  - One 100,000-gallon tank for storing distillation column bottoms.
  - Two 6,600-gallon, double-contained tanks for storing sulfuric acid.

In addition, one 7,500-gallon tank for storing liquid nitrogen is located in the biodiesel production facility.

The tanks are located in containment areas—underlying concrete slabs surrounded by a concrete wall that directs and drains to a collection sump—with the capacity to hold the volume of a 2-million-gallon tank plus an allowance for precipitation (Figure 2-3).

[4] The tanks were constructed in accordance with the appropriate seismic requirements for oil tanks current at the time of construction, including the American Society of Civil Engineers *Minimum Design Loads for Buildings and Other Structures* (Standard ASCE 7), International Building Code, and American Petroleum Institute (API 650).

Figure 2-3. Existing Storage Tanks in Containment Area

Loading and Unloading Areas

The facility is currently permitted to load and unload vegetable oil, methanol, sodium methylate, diesel, glycerin, and biodiesel by rail, tanker truck, and tank vessel.

Rail Loading and Unloading Area

The rail loading and unloading area includes five 1,500-foot-long rail spurs located along the southern boundary of the project site. The spurs connect to the PS&P rail line via a crossing at Port Industrial Road and West 1st Street. Of the five existing rail spurs, two are dedicated to receiving vegetable oil, two to loading biodiesel, and one (a separate track) to unloading chemicals. There are 75 storage spots, of which 64 are loading and unloading spots. The loading and unloading spots used for chemicals are located over a containment area that drains to a collection sump (Figure 2-4).

Figure 2-4. Existing Chemicals Loading and Unloading Spots over Containment Sump

Truck Loading and Unloading Areas

There are three truck loading and unloading areas. All are underlain with concrete containment that allows drainage to a collection sump. The area used for loading and unloading is dependent on the type of chemical being handled (Figure 2-2).

Vessel Loading and Unloading Area

Tank vessels are loaded and unloaded at the Terminal 1 berth. The berth is also used by Westway Terminal Company LLC to operate their existing methanol distribution facility, which is adjacent to the project site (Figure 2-2). The two companies, however, have separate infrastructure: the applicant's pipelines are located on the south side of the dock and Westway Terminal Company LLC's docks are located on the north side. Although the applicant's existing facility also provides pipeline infrastructure connections to Terminal 2, the pipeline is not used for existing operations.

Pipelines

A system of pipelines connects the loading and unloading areas (rail, truck, and vessel) with the storage tanks and biodiesel production facility. The system of pipelines runs from the truck and rail loading and unloading areas through the center of the storage tank area and biodiesel production

facility. The pipelines cross the Port's loop track at the southwest corner of the project site via an elevated pipe bridge to connect with the vessel loading and unloading areas at the Terminal 1 berth.

Piping throughout the facility is constructed per American Society of Mechanical Engineers Code for Pressure Piping (ASME B31) and is initially tested and periodically retested (API 570 nondestructive examinations) per applicable codes. Hoses used at Terminal 1 for over-water transfers comply with U.S. Coast Guard hose assembly requirements for facilities transferring oil or hazardous materials in bulk (33 Code of Federal Regulations [CFR] 154.500). The hoses used for biodiesel service in the production facility are heavy-duty polyvinyl chloride (PVC) hoses designed to transfer biodiesel, as well as petroleum products. The hoses used for sodium methylate are reinforced, synthetic, rubber, transfer hoses designed to handle a range of chemicals, acids, and alcohols. Hoses currently used inside the plant for normal nonhazardous use (i.e., cooling water, plant water, vegetable oil, and non-hazardous products) are made of nitrile synthetic rubber.

Buildings

Several buildings and trailers on the eastern end of the project site house the applicant's laboratory, conference rooms, and offices.

2.1.2.2 Existing Operations

Onsite Operations

The applicant is permitted to produce and transfer 100 million gallons of biodiesel annually. The primary feedstock is vegetable oil. The process of making biodiesel requires combining vegetable oil and methanol in the presence of a catalyst (sodium methylate) that chemically converts the oil into biodiesel. The primary byproduct of biodiesel production is glycerin. Small volumes of sulfuric acid are used to neutralize the glycerin before transporting it off site. Excess methanol used in the production process is captured, condensed, and reused. Vapors generated during the production process, including trace amounts of noncondensed methanol, are captured through a system of vents, and incinerated by a hot oil heater. The liquid nitrogen is vaporized on site and distributed throughout the facility to inert the biodiesel production process, which decreases the probability of methanol combustion. Biodiesel is generated roughly at a mass ratio of 1:1 with feedstock, meaning for every 1 ton of feedstock used, 1 ton of biodiesel is produced. There is a 1:1.4 mass ratio between the input of methanol and the production of glycerin with 1 ton of methanol used in biodiesel production generating just over 1.4 tons of glycerin.

Offsite Transport

Under existing conditions, most vegetable oil and all sodium methylate are transported to the project site by rail via the PS&P rail line as part of the existing freight traffic. Rail cars carrying these products are separated from other cars of an incoming train in the Aberdeen rail yard; they are stored on sidings in the yard then moved by a switching locomotive to the facility for unloading. This process typically results in one to two trips onto and off the project site each day, to deliver and remove an average of 12 rail cars. The rail cars are pushed onto the two receiving spurs where they are parked in the unloading spots. The facility can currently unload eight rail cars simultaneously.

Under existing conditions, tanker trucks make approximately 15 to 20 round trips per day to and from the project site. This traffic includes smaller amounts of vegetable oil, sulfuric acid (one truck

per week), liquid nitrogen (one truck per week), and methanol (an average of three trucks per day) used in the production of biodiesel, as well as the transport of biodiesel off site.

Vegetable oil transported to the project site by rail or tanker truck is transferred to the storage tanks via a system of hoses and pipes. Other chemicals are received at the rail or truck loading and unloading areas and are transported to the smaller storage tanks before being used in the production process. The other chemicals are stored in tanks specifically designed to meet the safety standards corresponding with their safety handling and storage classifications per the applicable regulations. Once production is complete, the finished biodiesel is piped to the tanks for storage before being transported off site.

The facility is permitted to load finished biodiesel onto rail cars, tanker trucks, or tank vessels. The mode of transportation off site depends on market conditions and can vary widely year to year. In 2013, the facility produced approximately 50 million gallons of biodiesel, which were almost all transported off site by tank vessel, resulting in approximately 15 vessel calls that year. There were two vegetable oil vessel calls and one biodiesel call in 2014. Through June of 2015, there has been one vegetable oil vessel and one biodiesel vessel.

Stormwater Management

Stormwater is water that falls onto Earth's surface during precipitation events (e.g., rainfall, snow, and ice melt). It includes the portion of this water that sinks into the ground (where pervious surface exists) and that accumulates on or flows over the ground surface on its way to a receiving water (stormwater runoff).

Stormwater that falls on the existing biodiesel production facility's paved surfaces (approximately 9.5 acres of impervious asphalt and concrete) (Figure 2-2) is handled in the following ways.

- Stormwater that falls within the vegetable oil feedstock and biodiesel storage tank containment areas, the containment area underlying the rail spur used for loading and unloading glycerin byproduct and sodium methylate, and the truck loading and unloading areas collects in sumps, where it is visually inspected before being manually released to the Port's stormwater conveyance system. Once released, this water flows to an oil/water separator before being discharged to Grays Harbor via the Port outfall located next to the Terminal 1 dock (Figure 2-2). If water in the sumps is contaminated, it can be treated in place or, if necessary, pumped out by a certified wastewater hauler and taken to an appropriate treatment facility.
- Stormwater that falls within the methanol/sodium methylate storage tank containment area and the biodiesel production area is collected and sent to the City of Aberdeen's publicly owned treatment works along with other production water (e.g., cooling tower blowdown, steam reboiler blowdown).
- Stormwater that falls on developed areas of the project site outside of the tank containment areas flows into catch basins that drain into the Port's stormwater conveyance system. This flow is conveyed into the oil/water separator before being discharged to Grays Harbor via the Port outfall located next to the Terminal 1 dock (Figure 2-2).

Stormwater that falls on the remaining 13.4 acres of the existing site, which are unpaved and mostly vegetated, typically infiltrates into the ground. Any surface runoff is directed into two temporary sedimentation ponds that were constructed in 2011, following the placement of fill material at the proposed project site. These ponds are equipped with overflow structures that discharge to Grays

Harbor. According to the Port, neither of these overflows has been used because the ponds have never filled to the level of the outfall riser before being discharged to Grays Harbor via the Port outfall located near the northwest corner of the project site (Figure 2-2).

Stormwater from the existing facility that is discharged to Grays Harbor via the two Port outfalls is covered under the applicant's current National Pollution Discharge Elimination System (NPDES) Industrial Stormwater Permit (Permit No. WAR006655). Stormwater discharged to the Aberdeen treatment works is covered under the applicant's individual Washington State Waste Discharge Permit (Permit No. ST0006214). For more information about stormwater management and water quality (including monitoring requirements of these permits and as part of the facility's Standard Industrial Classification of 2869), see Chapter 3, Section 3.3, *Water*.

2.1.3 Proposed Facilities and Operations

Under the proposed action, the facility's total throughput capacity[5] would increase to 1.26 billion gallons (30 million barrels) per year. The applicant intends to continue processing and distributing biodiesel in a manner similar to existing operations and to initially use the new capacity provided under the proposed action to handle (unload and load) and store crude oil for transport off site. However, the facility could distribute any one of or a mix of the existing or proposed bulk liquids depending on market forces over time. These bulk liquids would not change day to day, because conversion between products would necessitate time to clean tanks and could involve minor changes to infrastructure that may be required to handle one bulk liquid over another.

Up to nine storage tanks would be constructed at the project site to the north/northwest of the existing storage tanks. The existing rail facility would be expanded, and pipelines would be installed connecting the berth at Terminal 1 with the storage tanks. A marine vapor combustion unit would be installed west of the existing tanks to handle displaced vapors during vessel loading. No in-water work is proposed.

The proposed action would be completed in two phases: Phase 1 would include constructing five storage tanks, a system of pipelines, a marine vapor combustion unit, and additional buildings. It would also include expanding onsite rail facilities. Phase 2 would include constructing up to four storage tanks.

2.1.3.1 Proposed Facilities

Storage Tanks

The proposed action would involve constructing up to nine storage tanks at the project site to the north/northwest of the existing storage tanks (Figure 2-2). Five tanks would be constructed during Phase 1 and up to four tanks during Phase 2. Each tank would be approximately 95 feet wide and 64 feet tall and would have the capacity to hold 3.36 million gallons (80,000 barrels) of bulk liquids, for a total additional storage capacity of up to 30.2 million gallons (720,000 barrels).

The tanks would be designed with internal floating roofs that would rise and fall with the liquid levels inside the tanks, eliminating the vapor space above the liquid level and reducing the emissions from volatile hydrocarbons that are to be stored in the tanks. Inside the tanks, the liquid surface

[5] This amount includes existing and proposed bulk liquids.

would be entirely covered by the floating roofs, which are usually made of aluminum or steel, with the exception of a small ring-shaped space between the edge of the roof and the tank wall and around the internal tank support columns. These spaces contain seals attached to the edges of the roofs that slide against the tank walls and support columns as the roofs move up and down.

An impervious liner, concrete or covered bentonite clay membrane, approved by a registered Washington State Professional Engineer, would be constructed to contain the entire tank storage area. This liner would be built on grade-level or elevated foundations in bermed areas that have the capacity to contain the total volume of the largest tank, plus an allowance for precipitation.

Loading and Unloading Areas

Proposed expansion of the rail loading and unloading areas and equipment related to vessel loading and unloading is described below. No changes are proposed to the existing truck loading and unloading areas.

Rail Loading and Unloading Area

Under Phase 1 of the proposed action, approximately 6,100 feet of new track would be constructed at the project site. There would be two new rail spurs on the northern end of the project site and the existing five tracks located to the south would be extended (Figure 2-2). Forty-one new rail car unloading spots are proposed for crude or refined petroleum, bringing the total up to 105 spots, which would be sufficient to handle a unit train[6] consisting of 105 cars. In addition, 45 new storage spots are proposed, which would bring the total capacity for onsite rail car storage to 161 spots. New and existing loading and unloading spots would be underlain with a center-sloped concrete containment area that collects and directs any spills to a central sump capable of holding the contents of a single rail car plus an allowance for precipitation.

Connection of the new spurs to the PS&P would occur at the existing grade crossing at Port Industrial Road and would not require any track to be constructed off site. This connection would be maintained by the Port.

Vessel Loading and Unloading Area

No proposed changes to the Terminal 1 dock are proposed. The applicant is proposing to install a marine vapor control system to control emissions of volatile organic compounds from vapors displaced during the loading of organic liquid products into tank vessels. The system would consist of three main components: a dock safety unit, vapor blower staging unit, and vapor combustion unit. Vapors would be collected from tank vessels and routed through a vapor hose into the dock safety unit, located on the dock, to protect the vessels from explosions or fires, as well as excessive pressure and excessive vacuum. The vapor blower staging unit would transfer vapors from the dock safety unit to the vapor combustion unit. Vapors transferred to the combustion unit would be incinerated in a controlled manner (Olympic Region Clean Air Agency 2013).

The dock safety unit would be installed on top of the dock with no modification to the dock structure in the water. The vapor blower staging unit and vapor combustion unit would be installed west of the existing storage tanks (Figure 2-2).

[6] A unit train is a train in which all cars carry the same commodity and are shipped from the same origin to the same destination, without being split up or stored en route.

This system would be constructed and operated in compliance with U.S. Coast Guard regulations (33 CFR 154) and the applicable air quality permit.

Pipelines

During Phase 1, a system of pipelines would be constructed to transfer bulk liquids from the loading and unloading areas to the new storage tanks. The new pipelines would consist of one 24-inch-diameter pipe and one 16-inch-diameter pipe. In general, the pipelines would be routed from the rail unloading areas in the new and expanded rail spurs to the new storage tanks (above grade, on pipe racks) and from the storage tanks over the Port's loop tracks via the existing pipe bridge, along the Terminal 1 dock (at grade, on concrete block pipe supports) to the berth. All pumps, motors, electrical equipment, and process technology equipment would include the most energy-efficient systems for proficient operations. Hoses used at Terminal 1 for over-water transfers will comply with U.S. Coast Guard hose assembly requirements for facilities transferring oil or hazardous material in bulk (33 CFR 154.500, Hose Assemblies). They will be pressure-tested annually per U.S. Coast Guard requirements. The hoses used for crude oil transfer elsewhere at the project site will be designed for crude oil use.

Buildings

Phase 1 would also include constructing new buildings at the project site to replace the existing mobile trailers. The new buildings would provide offices, a laboratory, and maintenance and warehouse facilities (Figure 2-2). The U.S. Green Building Council Leadership in Energy and Environmental Design Silver Standards would be applied to the design of new buildings.

2.1.3.2 Proposed Operations

Under the proposed action, the facility's total throughput capacity[7] would increase to 1.26 billion gallons (30 million barrels) per year. The applicant intends to continue to process and distribute biodiesel in a manner similar to existing operations and to initially use the new capacity provided under the proposed action for crude oil. However, as previously stated, the facility could distribute any one of or a mix of the bulk liquids[8] depending on market forces over time. These bulk liquids would not change day to day, because conversion between products would necessitate time to clean tanks and could involve minor changes to infrastructure that may be required to handle one bulk liquid over another.

Biodiesel Production

Onsite Operations

Under the proposed action, operation of the biodiesel production facility would continue similar to existing operations described in Section 2.1.2.2, *Existing Operations*; however, some of the proposed bulk liquids (used cooking oil and animal fat) could be used as feedstocks in the biodiesel

[7] This amount includes existing and proposed bulk liquids.

[8] Additional bulk liquids covered under the proposed action include crude oil, ethanol, naphtha, gasoline, vacuum gas oil, jet fuel, no. 2 fuel oil, no. 6 fuel, kerosene, renewable jet fuel, renewable diesel, used cooking oil, and animal fat.

production process. These feedstocks would be unloaded, stored, and used on site at the biodiesel production facility similar to what is described for existing operations.

Offsite Transport

Offsite transport of all materials used in the biodiesel production facility, including bulk liquids (existing and proposed) would continue similar to existing operations (Section 2.1.2.2, *Existing Operations*). Because no changes are proposed to the biodiesel production facilities, shifts in the bulk liquid inputs would not result in material changes in the modes of transportation (tanker truck, rail, or tank vessel) or overall volume (trips) required for transport.

Additional Bulk Liquid Handling and Storage Capacity

Onsite Operations

As mentioned previously under the proposed action, the applicant would expand the facilities to increase onsite capacity to handle and store a greater volume of bulk liquids.[9] Operations related to this increased capacity would include receiving, storing, and loading (for offsite transport) any of the permitted bulk liquids (existing and proposed). Crude oil is the primary bulk liquid that would be handled and stored in the near future, and is anticipated to arrive at the project site by rail and to be loaded onto a tank vessel for transport from the site. The other bulk liquids are anticipated to be transported to and from the project site by rail and vessel. Because the bulk liquids would be transported in volumes too large for tanker truck transport, the proposed action is not anticipated to result in an increase in tanker truck traffic related to these operations.

Rail unloading and vessel-loading operations would be conducted in a manner similar to existing conditions. Once on site, rail cars would be pushed onto the loading and unloading spots where the bulk liquid would be unloaded into a central collection area and pumped to the storage tanks. Under the proposed action, the facility would be capable of unloading one unit train per day. Bulk liquids would be pumped from the storage tanks via the new pipelines to the Terminal 1 vessel-loading facilities where it would be transferred onto the tank vessel by hose. Depending on the size of the vessel calling, loading could take between 24 and 48 hours.

Offsite Transport

The additional bulk liquids associated with the proposed facilities could come from a variety of sources but are anticipated to be transported to and from the project site by rail and tank vessel. Arranging transportation to and from the project site would be the responsibility of the applicant's customers, and would be under the control and regulation of the rail and vessel operators.

Crude oil is expected to come by rail from the Bakken formation in the Intermountain Region and Central United States, but could also come in the form of diluted bitumen derived from oil sands from Alberta, Canada. The most likely source of ethanol is the Midwest. Sources of the other bulk liquids are unknown and would be based on global energy demands and energy markets.

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[9] Increased handling and storage capacity is presumed to be solely dedicated to the proposed facilities (Section 2.1.3.1, *Proposed Facilities*); however, the applicant may elect to submit an air permit modification application to allow use of the existing bulk liquid storage tanks for storage of the proposed bulk liquids. This would not increase the facility's total annual throughput or assumptions related to offsite transport, but would provide operational flexibility by increasing storage capacity for any single bulk liquid commodity.

Crude oil would most likely be transported by tank vessel to refineries in the Puget Sound area and northern California (Richmond area). Although transport of U.S. crude oil overseas is currently not allowed under U.S. law, it is possible for Canadian oil to be transported abroad, and overseas transport of U.S. oil could occur if regulations change. Other bulk liquids could be transported to domestic or international ports.

Rail

All trains arriving at or departing from the project site would use the PS&P rail line as far as Centralia (Figure 2-1). Beyond Centralia, trains could travel a variety of routes on the national rail system depending on the source or destination of the bulk liquid. Rail transportation is discussed in detail in Chapter 3, Section 3.15, *Rail Traffic*, and Chapter 5, *Extended Rail and Vessel Transport*.

Under the proposed action, increased train traffic would consist primarily of unit trains, of an average of 105 cars (1.09 miles long) to a maximum of 120 cars (1.25 miles long). Unit trains are typically transported by four locomotives and would be broken into smaller segments and taken by switch engine to and from the project site. Smaller quantities of crude oil or other bulk liquids may be transported by rail car as part of PS&P's existing freight traffic and not additional unit train trips. Operation of the proposed action at maximum throughput would result in a maximum of 730 unit train trips[10] per year, or two trips per day on average, along the PS&P rail line. These trains would result in additional switch trips to bring the cars onto and off the project site, as discussed in detail in Chapter 3, Section 3.15*, Rail Traffic*.

Vessel

Bulk liquids could also be transported to and from the project site by tank vessel. Tank vessels would travel through the harbor along the navigation channel (vessel transportation is discussed in Chapter 3, Section 3.17, *Vessel Traffic*). The depth constraints of the navigation channel limit the size of ship able to enter the harbor. The mix of vessel types could vary over time, but the largest tankers would be Panamax-class[11] vessels with capacity to hold up to 14.7 million gallons (350,000 barrels). Tank barges are anticipated to be the most likely vessel type with a capacity ranging from 1.05 million to 6.3 million gallons (25,000 to 150,000 barrels).

Operation of the proposed action at maximum throughput would result in a maximum of 400 trips[12] per year—approximately one trip per day on average.

Stormwater Management

Construction of the proposed action would result in an additional 8.7 acres of impervious surface area (2.2 acres of the proposed area of development are already paved), totaling 18.2 acres (80% of the 22.9-acre site). Stormwater management would continue as described in Section 2.1.2.2, *Existing Operations*, with the following exceptions.

[10] A trip represents one-way travel; in other words, an inbound trip and an outbound trip are counted as two trips.

[11] Panamax-class refers to the size limits for vessels traveling through the Panama Canal.

[12] This number of trips assumes 100% tank barges. This assumption was used for the analysis because it results in the highest number of trips, based on tank barges having smaller capacity than tankers.

- All rail spurs would be upgraded with underlying containment areas. Stormwater in these areas would collect in sumps and be handled as described for the storage tank containment areas under existing conditions.
- Stormwater falling on the remaining 2.2 unpaved acres of the project site would infiltrate the ground. Any surface runoff would be directed into the remaining (eastern) temporary sedimentation pond, which is equipped with an overflow structure that discharges to Grays Harbor via the Port's outfall located near the northwest corner of the project site (Figure 2-2).

Additional requirements related to updated NPDES permits are discussed in Chapter 3, Section 3.3, *Water*.

2.1.4 Construction Schedule and Methods

Phase 1 construction of the proposed action is tentatively scheduled to start in 2016 and is anticipated to last up to 18 months. The additional storage tanks could be constructed in this timeframe or, if constructed later, would require 3 to 4 months. Construction would require approximately 76 workers for Phase 1 and 34 more workers for Phase 2 if the additional tanks were constructed later. Construction is planned to occur during daylight hours (7:30 a.m. to 4:30 p.m.), Monday through Friday. However, the schedule may be altered to add some weekend daytime construction and/or extended 10-hour workdays to make up for weather delays.

This type of construction would likely require using the following types of machinery: an excavator, D-8 dozer, dump truck(s), backhoe(s), maintenance trucks, a 70-ton crane, two 40-ton cranes, a 250-kilowatt generator, a 65-kilowatt generator, a 60-foot manlift, forklift(s), air compressor(s), a concrete pump, a compactor, and concrete finisher. Construction activities for several of the components of the proposed facilities would likely occur simultaneously.

2.1.4.1 Storage Tanks

The area where the new storage tanks would be built is currently undeveloped and would require site grading. Because the proposed tanks would be supported by piles, no soil preloading would be required to consolidate the underlying soil. For grading, approximately 314,000 square feet would be contoured with no material removed and the addition of 23,000 cubic yards of fill. Once contoured, the concrete or impervious clay liner would be installed inside the entire storage tank area and the concrete containment wall or berms would be built around this area.

The foundation design[13] is expected to be similar to that of the existing tanks with additional piles per tank to account for the larger tank diameter and height. The tanks would sit on 3-foot-thick concrete foundations supported by 16-inch-diameter grout-driven piles to a depth of approximately 75 feet. It is anticipated, based on the construction of existing tanks, that once all piles are driven for a tank foundation, the concrete slab would be formed. The piles would extend 6 inches into the slab and a rebar cage would extend into each pile to reinforce the pile and connect them to the concrete

[13] The detailed foundation design and quantity and depth of piles would be determined based on detailed geotechnical analysis and civil design in accordance with current building and fire codes (International Building Code and International Fire Code) and their associated design standards and seismic requirements, including the American Society of Civil Engineers Standard 7 (Standard ASCE 7) and the American Petroleum Institute Standard 650 (API 650).

slab. Concrete would then be poured, filling the form for the slab. The tanks would sit on top of the foundation with mechanical attachment (anchor bolts) to the slab.

Impact pile driving would last approximately 2 to 3 months during daylight hours. The tanks would be erected using cranes and welding equipment. A 40-ton crane would be used to move the pipes around the project site and stack them into the jigs for welding. Concrete would be brought in by truck from Aberdeen and pile materials would arrive by truck or train. The storage tanks and internal floating roofs would be assembled on site from prepainted and rolled sheets; once in place, the field welds would be painted and the associated pipelines and pumps would be installed.

2.1.4.2 Loading and Unloading Areas

Rail Loading and Unloading Area

All elements of the rail loading and unloading area would be constructed during Phase 1. Construction of the rail facilities would require grading and forming the project site to be consistent with the grade of the existing rail. Crews would lay rebar and pour concrete to construct the containment area underlying the new and extended rail spurs. The loading and unloading equipment (racks, hoses, pipelines, and pumps) would then be installed. This work would require using bulldozers, lifts, delivery trucks, and small cranes.

Vessel Loading and Unloading Area

All components of the marine vapor combustion unit would be manufactured off site. The dock safety unit would be installed on a concrete pad and anchored to the existing dock with foundation anchor bolts. The foundation design would be provided by a Washington State-licensed structural Professional Engineer. The vapor blower unit and vapor combustion unit would be installed west of the existing storage tanks (Figure 2-2). The vapor blower unit would be installed on a concrete pad and anchored with foundation anchor bolts. The vapor combustion unit would likely be anchored to a concrete pad supported by piles. The foundation designs would be provided by a Washington State-licensed structural Professional Engineer. Once installed, the manufacturer would commission the system for operation. The unit would be tested by the Olympic Region Clean Air Agency to ensure that it complies with the air permit and applicable standards.

2.1.4.3 Pipelines

The pipeline system would be installed from the existing berth at Terminal 1 to the storage tanks and would span the Port's loop tracks via the existing pipe bridge. The pipelines to the terminal would be of welded steel, constructed per ASME B31 Code for Pressure Piping, and tested per applicable regulations. Pipeline work in the shoreline area would not require any in-water work.

2.1.4.4 Buildings

The locations of the support facilities are identified in Figure 2-2. The building designs have yet to be finalized, but construction would include preparing the project site by removing earth, pouring a foundation, framing the structure, and installing walls and windows.

2.2 What is the no-action alternative?

Under the no-action alternative, none of the proposed facilities would be constructed and the applicant would continue to operate its existing facility as described in Section 2.1.2.2, *Existing Operations*.

Chapter 3
Affected Environment, Impacts, and Mitigation

3.0 Introduction

This chapter describes existing conditions in the study area, presents the environmental impacts that would likely result from construction and routine operation[1] of the proposed action, and identifies measures to mitigate those impacts. For comparison purposes, the consequences of the no-action alternative are also discussed.

3.0.1 What topics are addressed in the impact analysis?

This chapter is divided into the following 17 sections, with each section addressing one element of the built or natural environment.

- 3.1 Earth
- 3.2 Air
- 3.3 Water
- 3.4 Plants
- 3.5 Animals
- 3.6 Energy and Natural Resources
- 3.7 Noise and Vibration
- 3.8 Land and Shoreline Use
- 3.9 Aesthetics, Light, and Glare
- 3.10 Recreation
- 3.11 Historic and Cultural Preservation
- 3.12 Tribal Resources
- 3.13 Public Services and Utilities
- 3.14 Hazardous Materials
- 3.15 Rail Traffic
- 3.16 Vehicle Traffic and Safety
- 3.17 Vessel Traffic

[1] Chapter 4, *Environmental Health and Safety*, addresses the potential impacts from increased risk of accidents (e.g., storage tank failure, train derailments, vessel collisions) and related consequences (e.g., release of crude oil or other proposed bulk liquids).

3.0.2 How is each resource section organized?

Each section answers the following questions.

- What is the study area for the resource?
- What laws and regulations apply to the resource?
- How were impacts on the resource evaluated?
- What are the types and condition of the resource in the study area?
- What are the potential impacts on the resource?
- What mitigation measures would reduce impacts on the resource?
- Would the proposed action have unavoidable and significant adverse impacts on the resource?

3.0.3 What alternatives are analyzed in this chapter?

This chapter presents an analysis of impacts that could occur as a result of construction and routine operation of the proposed action. The analysis considered impacts over a 20-year period (2017 to 2037) to account for future growth and development.

This chapter also presents an analysis of impacts that could occur if the proposed action were not approved (the no-action alternative). This analysis also considered impacts over the 20-year analysis period, and includes impacts associated with future growth and development that is reasonably certain to occur during this timeframe, regardless of the proposed action. Impacts of the no-action alternative are presented first as a basis of comparison.

3.0.4 What areas and activities were analyzed?

The study area is specific to each resource but in most cases includes resources on and near the project site that could be affected by construction and onsite operations, resources along the Puget Sound & Pacific Railroad (PS&P) rail line—from Centralia, Washington, to the project site—that could be affected by rail transport, and resources in and around Grays Harbor that could be affected by vessel transport.

The project site includes the property leased by Imperium Terminal Services (applicant) on which the existing and proposed facilities are and would be located. Activities at the project site would include construction (e.g., site clearing and erecting storage tanks) and operations (e.g., rail unloading and vessel loading) that would be directly under the control of the applicant. These activities would be subject to the permit conditions that would be required by the City of Hoquiam, the Washington State Department of Ecology (Ecology), and other state and local agencies.

Transport of bulk liquids to and from the project site by rail and vessel would occur under the responsibility of the rail and vessel operators, respectively. Although the applicant does not have control over offsite transport, implementation of the proposed action would generate rail and vessel trips that could result in environmental impacts along the transportation corridors. For example, increased rail and vessel trips could lead to congestion and related traffic delays, increased noise, and increased air emissions. The transportation corridors that would be affected by offsite transport would vary depending on the commodity being transported, the source of the commodity, and the final destination for delivery. However, all rail trips generated by the proposed action would occur

along the PS&P rail line between Centralia and the project site because this is the only rail line connecting the national mainline railroad system to the Port of Grays Harbor. Similarly, all vessel trips generated by the proposed action would travel through Grays Harbor from Terminal 1 to the Pacific Ocean. Therefore, these known corridors are the focus of the impact analysis related to offsite transport in this chapter.

3.0.5 How was mitigation identified?

Development of the mitigation measures included an evaluation of whether applicable regulations, specific permit conditions, and the required plans would adequately reduce potentially substantial impacts identified in this draft environmental impact statement (Draft EIS). Additionally, when applicable, the Draft EIS considered the incorporation of specific voluntary measures or design features to be executed by the applicant and how those measures would reduce potential impacts. When those combined measures did not sufficiently reduce the risk of impacts, additional applicant measures were identified as required by the Washington State Environmental Policy Act (SEPA) consistent with Washington Administrative Code [WAC] 197-11-660. The thresholds and measures were developed based on direction and guidance from the co-lead agencies. Potential measures were identified and evaluated even if they were not under the jurisdiction of the deciding co-lead agencies, in this case, the City of Hoquiam and Ecology.

3.0.6 What impacts are addressed in other chapters of the Draft EIS?

The analysis in this chapter focuses on impacts associated with construction and routine operation of the proposed action in the study area. The following chapters present additional impacts.

Chapter 4, *Environmental Health and Safety*, looks at the potential for increased safety risks under the proposed action. Specifically, onsite operation activities (e.g., rail unloading, tank storage, and vessel loading) and the increased frequency of rail and vessel trips could increase the likelihood of an accident (e.g., storage tank rupture, train derailment, or vessel collision) and result in substantial environmental incidents (e.g., release of crude oil or other proposed bulk liquids). Although the specific impacts would depend on the frequency, location, contents, and volume of a spill, as well as the efforts to contain and clean up the spill, the potential impacts on the human and natural environment would be far-reaching.

Chapter 5, *Extended Rail and Vessel Transport*, addresses impacts related to rail and vessel transportation beyond the study area from the source of the bulk liquids to their final point of delivery.

Chapter 6, *Cumulative Impacts*, addresses the impacts of the proposed action when considered in combination with all other past, present, and reasonably foreseeable future projects.

Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis*, addresses economics, social policy, and the costs and benefits related to the proposed action.

3.1 Earth

Earth refers to the soil and geology conditions in a particular area. Soils and geology are resources if the defining characteristics (such as soil structure, composition, or geologic formations) are unique or valuable or support unique habitats. Soils and geology can also influence the potential for geologic hazards, such as landslides, earthquakes, seismic effects (e.g., surface fault ruptures, strong ground shaking, liquefaction, lifting and lowering of the surface, and tsunamis), and volcanic activity. Understanding the types of soils and the underlying geologic conditions is important in determining whether a project would be exposed to increased risks related to these conditions.

This section describes earth resources in the study area, including geology and soils and geologic hazards. It then describes impacts on geology and soils that could result under the no-action alternative or as a result of the construction and routine operation[1] of the proposed action. Finally, this section presents any measures identified to mitigate impacts of the proposed action and any unavoidable and significant adverse impacts.

3.1.1 What is the study area for earth resources and conditions?

The study area for earth resources consists of geology and soils on and near the project site that could be affected by construction and routine operation of the proposed action. The study area also includes geology and soils that could be affected during routine rail transport along the Puget Sound & Pacific Railroad (PS&P)[2] rail line and vessel transport through Grays Harbor out to 3 nautical miles from the mouth of the harbor.

The study area includes the broader geologic conditions that could affect the project site and the rail and vessel transportation systems. These broader conditions include the potential for geologic hazards (e.g., landslides, earthquakes, seismic-related events, and volcanic activity).

3.1.2 What laws and regulations apply to earth resources and conditions?

Laws and regulations for determining potential impacts on earth resources are summarized in Table 3.1-1. More information about these laws and regulations is provided in Appendix B, *Laws and Regulations*.

[1] Chapter 4, *Environmental Health and Safety*, addresses the potential impacts from increased risk of accidents (e.g., storage tank failure, train derailments, vessel collisions) and related consequences (e.g., release of crude oil or other proposed bulk liquids).

[2] The PS&P rail line refers to the rail line between Centralia and the project site.

Table 3.1-1. Laws and Regulations for Earth

Laws and Regulations	Description
Federal	
Clean Water Act, Section 402 (33 U.S.C. 1251 et seq.)	Establishes the NPDES permitting program, under which discharges of pollutants are regulated and mandates that certain types of construction activity comply with the requirements of the EPA NPDES program.
State	
State Building Code (RCW 19.27)	Provides specific design standards, through the adoption of the International Building Code, for occupied structures that should be met to reduce the risk of damage to people and property from geologic hazards.
Facility Oil Handling Standards (WAC 173-180)	Establishes minimum standards for oil facility and transfer operations.
Local	
Adoption of International Building Code (HMC 2.08 and AMC 15.08)	Recognizes that the respective city has adopted the International Building Code, 2012 Edition, as the official building code of the city.
Adoption of International Fire Code (HMC 2.38 and AMC 15.12)	Recognizes that the respective City has adopted the International Fire Code, 2012 Edition, as the official fire code of the City.
Land Development—Erosion and Sediment Control (HMC 10.05.120 and AMC 13.70)	HMC 10.05.120 requires all new industrial development to provide for the control and management of stormwater runoff. AMC 13.70 establishes minimum requirements and procedures to control the adverse impacts associated with increased storm and surface water runoff.
Shoreline Management (HMC 11.04 and AMC 16.20)	Carries out responsibilities imposed by the Shoreline Management Act of 1971.
Critical Areas Ordinance (HMC 11.06 and AMC 14.100)	Sets forth the definitions and process for designating and protecting critical areas within the city limits of Hoquiam and Aberdeen, respectively.

U.S.C. = United States Code; EPA = U.S. Environmental Protection Agency; NPDES = National Pollutant Discharge Elimination System; RCW = Revised Code of Washington; WAC = Washington Administrative Code; HMC = Hoquiam Municipal Code; AMC = Aberdeen Municipal Code

3.1.3 How were impacts on earth resources and conditions evaluated?

This section describes the sources of information and methods used to evaluate impacts.

3.1.3.1 Information Sources

Information on earth resources in the study area was obtained from the following sources. Although past permits and approvals are no longer applicable, information from these sources is relevant to characterizing the affected environment and regulatory context.

- Environmental permitting documents prepared for the proposed action by the applicant, the City of Hoquiam, and Washington State Department of Ecology (Ecology).
  - October 2012 and February 2013 Washington State Environmental Policy Act (SEPA) environmental checklists and associated appendices.
  - February 2013 Shoreline Substantial Development Permit application package.
  - February 2013 Critical Areas Permit Checklist and assessment report.
  - May 2013 Mitigated Determination of Nonsignificance.
  - April 2013Findings of Fact and Conclusions of Law of the Shoreline Administrator.
  - February 2013 Joint Aquatic Resource Permit Application.
  - Geotechnical engineering report and letter (GeoEngineers 2006, 2014).
- U.S. Geological Survey (USGS) National Seismic Hazard Maps and associated report.
- Cascadia Region Earthquake Workgroup report on Cascadia subduction zone earthquakes.
- Grays Harbor County 2011–2016 Hazard Mitigation Plan (2006).
- Federal Emergency Management Agency Risk Report (Draft) for Grays Harbor County including the Cities of Hoquiam, Cosmopolis, Hoquiam, Ocean Shores, Westport, Montesano, McCleary, Elma, and Oakville.
- Geologic mapping of the Hoquiam area by Logan (1987).
- Washington State Department of Natural Resources geologic and hazard mapping.
- An updated assessment of tsunami risks specific to the project site (Appendix C, *Tsunami Impact Modeling and Analysis*).
- Washington State Seismic Safety Committee (2012) Resilient Washington State report.
- Geological literature from professional journals, USGS, and the Washington State Department of Natural Resources as referenced in this section.

Data obtained from these sources were augmented with general observations of site conditions made during a September 10, 2014, site visit and facility tour.

3.1.3.2 Impact Analysis

The impact analysis for geology and soils considers both the potential for the proposed action to affect the geologic environment and for the geologic environment to affect the proposed action. These impacts were evaluated in the context of the regulatory requirements (Section 3.1.2), the geologic and soil conditions at the site, and the broader geologic environment that can affect the project site or its associated transportation corridors (PS&P rail line and Grays Harbor Navigation Channel).

3.1.4 What earth resources and conditions are in the study area?

This section describes the earth resources in the study area that could be affected by construction and routine operation of the proposed action or that could contribute to impacts on the proposed

action. This section provides the general context for earth resources in the study area and describes earth resources and geologic hazards on the project site, along the PS&P rail line, and in and along the shoreline of Grays Harbor.

3.1.4.1 Regional Geology

The regional geology of western Washington is related to the eastward movement of the San Juan de Fuca tectonic plate against the North American Plate (Parsons et al. 2005; Washington State Department of Natural Resources 2014a). The San Juan de Fuca plate plunges (or forms a subduction zone) progressively deeper as it move east underneath the North American plate. The movement compresses the rocks above it, producing uplift and down dropping. This plunging zone, the Cascadia Subduction Zone (CSZ), extends from northern California through Oregon and Washington to southern British Columbia. The Juan de Fuca plate also melts at depth and the magma (lava) that is produced rises to the surface forming the Cascade Range volcanic arc.

Hoquiam and Grays Harbor are at the western edge of the Washington Coast Ranges within the Willapa Hills physiographic province (Washington State Department of Natural Resources 2014b). The Willapa Hills are composed of a variety of sedimentary and volcanic rocks and are not intensely deformed compared to the Olympic Mountains to the north. The area is outside the extent of glaciation although glacial-influenced river sedimentation did occur along the Chehalis River during glacial periods. The Chehalis River crosses the Willapa Hills and enters the Pacific Ocean through Grays Harbor. The glacial-age (greater than 10,000 years ago) ancestral Chehalis River flowed through this same valley and the surficial deposits in the valley range from recent alluvium (that is, ongoing sediment transport with associated river channel and floodplain deposition) and older alluvial deposits that are slightly higher in elevation (river terraces). These deposits extend along the Chehalis River to Centralia and beyond. The Chehalis River is at a relatively low elevation along its entire length. It is at about 140 feet mean sea level at Centralia (River Mile 66), about 55 feet mean sea level at Oakville (River Mile 42) about 20 feet mean sea level at Satsop (River Mile 20), and is at sea level at Aberdeen.

3.1.4.2 Geology and Soil Conditions

Prior to the late 1970s, the majority of the project site was occupied by a boat slip (Slip 1) that was constructed in the 1920s as part of the Port of Grays Harbor (Port) Marine Terminal No. 1. This slip was used to berth ships for loading and fueling and for the storage of floating logs and log rafts. A 2000-foot by 300-foot pier (Pier 1) once extended along the northern portion of the site, separating Slip 2 from an adjacent boat slip to the southeast (Slip 2). This pier included docks along both sides that provided mooring locations in both slips, two traveling cranes along the Slip 1 dock, and other freight-handling equipment. Other features included multiple rail lines down the center of the pier and a large warehouse adjacent to Slip 2. Between 1983 and 1994, Slip 1 was hydraulically filled by the Port with material dredged from Grays Harbor and was variably capped by fill from a roadway project (GeoEngineers 2006). Additional information on the historical conditions and photographs of the project site are provided in Section 3.11, *Historic and Cultural Preservation*.

The project site is relatively flat (1% maximum slope) with the exception of a dredged material stockpile at its southern end that is approximately 20 feet high. The average elevation of the site is approximately 10 feet above mean sea level. It is partially paved (9.5 acres of the 22.9-acre), with no natural soils or agricultural soils present. Unpaved areas are located in the northern and western portion of the site and include vegetated fill material. These areas are mapped as urdorthents by the

U.S. Department of Agriculture, Natural Resources Conservation Service. Urdorthents are young soils that have developed in dredged materials. The site is underlain at depth by river and floodplain deposits of glacial- and post-glacial-age alluvium (Quaternary-age alluvium from 1.8 million years ago) (Logan 1987; Washington State Department of Natural Resources 2014a: Interactive Geologic Map). Because of this fill, the normal Natural Resources Conservation Service soil mapping and erosion hazard designations are not applicable. If exposed, the underlying dredge materials would have a low erosion hazard (surface, rill, and inter-rill) based on the project site's low gradient. Geotechnical investigations at the project site and the adjacent site for Westway Terminal Company LLC were completed in 2006 and 2013, respectively. According to the investigations completed at the project site, the majority of the site consists of subsurface layers of silt, sandy silt, silty fine sand with occasional gravels (GeoEngineers 2006). These materials are moist to wet and soft to medium stiff to loose. The report estimates that gravel occurred below 150 feet and bedrock at depths of greater than 200 feet below ground surface. Subsurface investigations completed for the Westway project site (Hart Crowser 2013) yielded similar results with subsurface layers consisting of gravel to about 40 feet below the surface underlain by loose to dense sandy gravel to a depth of about 130 feet below the surface. Borings collected at the eastern part of the Westway project site indicate sandier soils.

The area surrounding the project site is also relatively flat with the closest areas of steeper slopes occurring approximately 0.75 mile to the north. The adjacent mountain bedrock uplands begin approximately 0.75 mile to the north with river alluvium, alluvial fans, and talus along the valleys inset within the bedrock (Hoquiam River, Fry Creek, Wishkah River).

PS&P Rail Line

The entire PS&P rail line is built on river sediments of the Chehalis River or its tributaries. Some of these sediments are slightly higher river terraces above the elevation of the floodplain. These sediments are approximately hundreds of feet deep (Logan 1987; Washington State Department of Natural Resources 2014a: Interactive Geologic Map).

Grays Harbor

Overall, the sediments underlying Grays Harbor and the adjacent nonbedrock uplands are varying sequences of shallow marine, longshore coastal bar, estuarine, intertidal, river alluvium, and floodplain deposits. In general, these sediments range from gravel to sands, silts, and clays with the finer grain sizes dominating. Geotechnical investigations at the Port adjacent to the North Channel Reach of the navigation channel have found these types of sediments to depths of greater than 150 feet below ground surface (GeoEngineers 2006; Hart Crowser 2013; Shannon and Wilson 2013).

3.1.4.3 Geologic Hazards

In the study area, the broader geologic conditions that could affect the project site and transportation corridors include landslides and slope instability, earthquake and earthquake-related hazards, and volcanic activity.

Landslides and Slope Instability

Landslides can occur as the result of various factors, but primarily occur on steeper slopes in combination with loose or unstable soils. Landslides most often occur during the rainy season such as during the December 2007 storm, the January 2009 storm, and the January 2015 storms

(Sarikhan and Contreras 2009; Stewart et al. 2013; Washington State Department of Natural Resources 2014b), but can also occur as the result of earthquakes and other earthquake-related hazards. Earthquake-induced landslides also occur primarily during saturated conditions (Washington State Department of Natural Resources 2014b).

Project Site

The soil and slope characteristics of the project site (i.e., gravel, sand, and relatively flat) result in a low potential for landslides or soil instability. Additionally, the risks of mass movement of soil into the adjacent harbor are considered very low because the shoreline adjacent to Terminal 1 is well supported with riprap and armoring for stabilization. No landslide hazard areas are mapped along the Hoquiam shoreline, including the project site (Washington State Department of Natural Resources 2014c: hazard map landslides). The closest landslide hazard area (Slaughter et al. 2013) is approximately 0.75 mile to the north and any landslides at this distance would have no impact on the project site.

PS&P Rail Line

Along the PS&P rail line, there are several areas where landslides could occur because of steeper slopes and looser soils. Beginning on the east side of Aberdeen where it closely parallels US Route 12 (US 12) between highway milepost (MP) 0.0 and MP 2.5, the rail line travels within 60 to 190 feet of a steep hillside for about 2.25 miles before heading south onto the Chehalis River floodplain. It is again close to hillsides from the east side of Central Park, coming within approximately 50 to 100 feet of the base of the slope for about 1.5 miles. In Elma, the rail line comes closer to the hillsides but is still approximately 800 feet away at the closest point. Beginning approximately 3 miles to the southeast of Elma to just east of Oakville, the rail line closely parallels US 12 for about 9.75 miles between MP 24.5 and MP 34.25 and is immediately adjacent to steep hillsides to the east. It is also immediately adjacent to hillsides on its north side for about 5 miles between Oakville and the community of Gate. From Gate to Centralia, the rail line is not adjacent to hillsides except for approximately 0.25 mile where it is next to the hillside at Blakeslee Junction immediately northwest of Centralia.

For the sections of the PS&P rail line that closely parallel US 12, the Washington State Department of Transportation (WSDOT) Unstable Slope Management Program[3] provides some information on the stability of adjacent hillsides (Figure 3.1-1). For the segment between US 12 MP 0.0 and MP 2.5, WSDOT identifies six areas of unstable slopes, including one rock fall, four landslides, and one debris flow that vary between 0.01 and 0.46 mile in length (Trople pers. comm.). The rock fall, debris flow, and one of the landslide areas are located on the north side of the highway (i.e., immediately upslope of the roadway), with the toe of the unstable slope located between 110 and 370 feet away from the edge of the PS&P rail line. WSDOT has installed mitigation measures along the rock fall area in this segment. The remaining three landslide areas occur on the south side of the highway (i.e., immediately upslope of the PS&P rail line), with the toe-of-slope located between about 10 to 20 feet of the rail line.

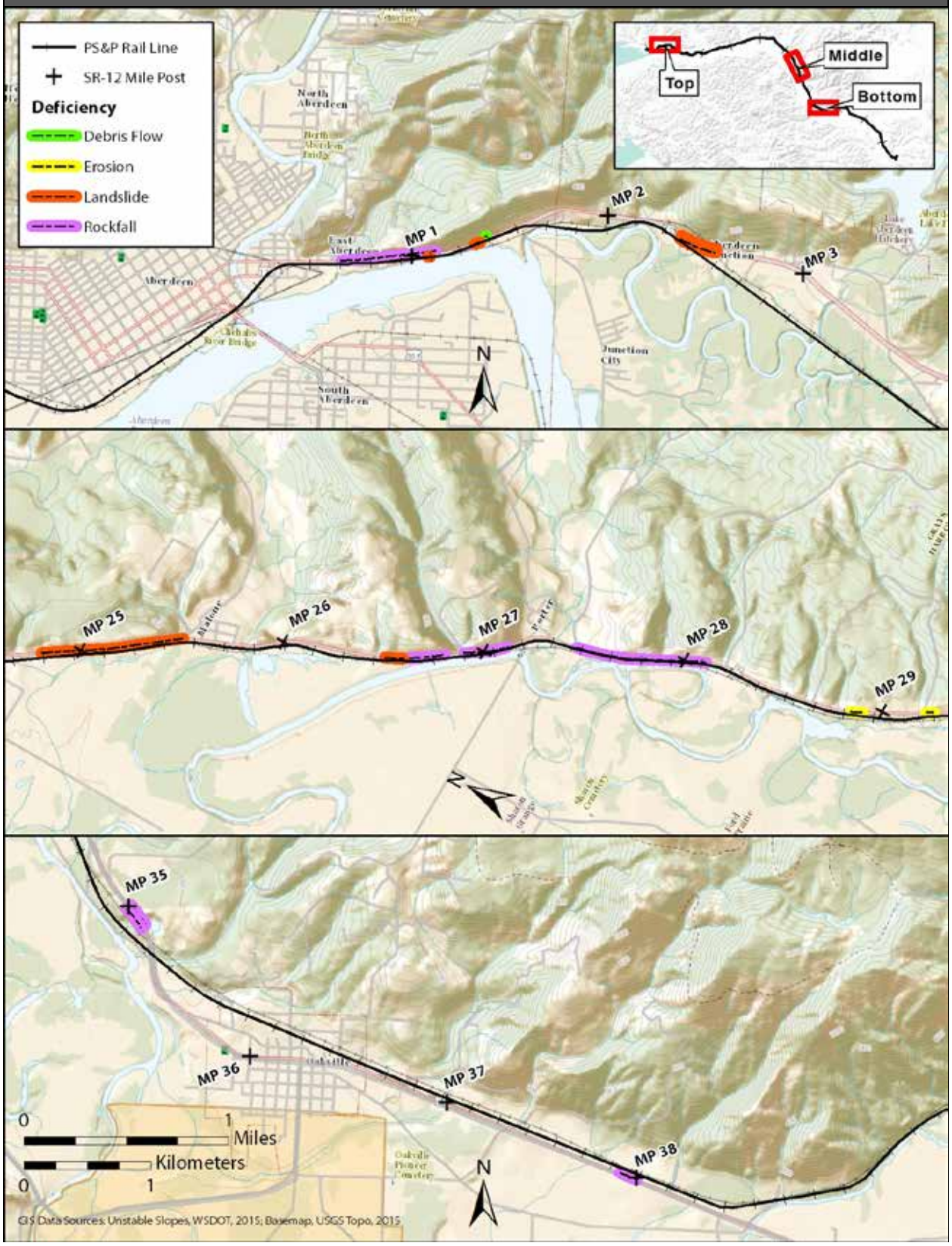
[3] The Unstable Slope Management Program was developed by WSDOT to inventory, rate, and describe unstable slopes within the WSDOT highway system and to develop conceptual slope mitigation designs and cost estimates for these areas. It includes the Unstable Slope Management System, which is a computer program used to evaluate known unstable slopes by balancing hazard and risk in prioritizing funding for proactive stabilization efforts (Washington State Department of Transportation 2010).

For the segment the PS&P rail line that parallels US 12 between MP 24.5 and MP 34.25, WSDOT identifies seven unstable slopes including three areas with rock falls, two areas with landslides, and two areas with slope erosion issues (Trople pers. comm.). These areas vary between 0.04 to 0.7 mile in length, with the unstable slopes occurring on the east side of the highway (i.e., immediately upslope of the roadway). Distance between the rail line and toe-of-slope in these areas typically varies between 60 to 280 feet. WSDOT has installed mitigation measures for one of the rock fall areas in this segment.

Grays Harbor

Some moderately steep slopes are directly adjacent to the Grays Harbor shoreline along the northern edge of the Bowerman Basin near Grays Harbor City, approximately 4 miles west of the project site. This area is susceptible to shallow landsliding (Slaughter et al. 2013). Submarine (underwater) landslides do occur in deep water approximately 40 miles west of the entrance to Grays Harbor. However, these landslides would not cause any instability within Grays Harbor.

Figure 3.1-1. Unstable Slopes near the PS&P Rail Line



Earthquakes

Western Washington is subject to substantial earthquake activity (Washington State Department of Natural Resources 2014b). Earthquakes are most often the result of sudden movement within the Earth's crust or from volcanic activity. The magnitude of an earthquake is most commonly measured by the moment magnitude scale (1.0 to 10.0), which is a 10-base logarithmic scale. This means that an earthquake of magnitude 5.0 would be 10 times stronger than an earthquake of magnitude 4.0, and so on.

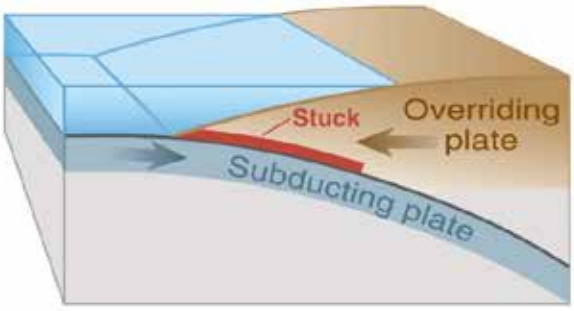
The Modified Mercalli intensity scale[4] correlates the measured magnitude of an earthquake with the perceived intensity and likelihood of damage. For example, according to the Mercalli scale, earthquakes of 6.0 to 6.9 magnitude are considered strong with slight to moderate damage to ordinary, well-built structures. Historic moderate to large earthquakes in the region include the magnitude 7.1 Olympia earthquake (April 13, 1949), the magnitude 6.5 Seattle-Tacoma earthquake (April 29, 1965), and the magnitude 6.8 Nisqually earthquake (February 28, 2001) (Noson et al. 1988; Pacific Northwest Seismic Network 2014). Earthquakes of these magnitudes can cause substantial damage in the immediate vicinity of their occurrence. The amount of shaking and associated damage declines with distance from the earthquake source.

The largest magnitude earthquakes (9.0 magnitude and higher) that could affect the region would likely occur as the result of movement along the CSZ, which extends from northern California through Oregon and Washington to southern British Columbia. A subduction zone is the area created when one tectonic plate moves over another plate within the Earth's crust. The CSZ is created as the San Juan de Fuca tectonic plate plunges (or forms a subduction zone) progressively deeper as it move east underneath the North American plate. The overriding plate is compressed, producing stress (Figure 3.1-2, Panels A and B). The CSZ earthquake is the result of the release of that stress by the unlocking of, and movement between, the two plates.

A rupture along the CSZ would affect the entire coastline from northern California to southern British Columbia. Damage would occur in communities facing the Pacific Ocean (e.g., Cosmopolis, Hoquiam, and Aberdeen, Washington) and in the major urban areas of Portland, Oregon; Puget Sound, Washington; California and Vancouver, British Columbia (Cascadia Region Earthquake Workgroup 2013).

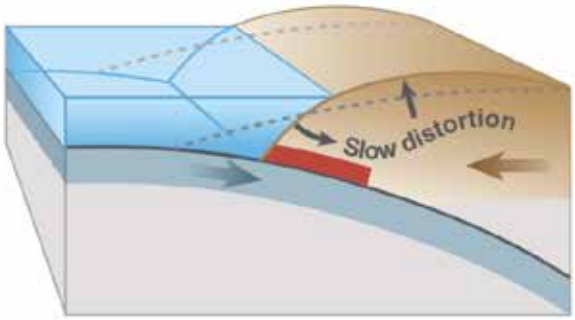
[4] The Modified Mercalli intensity uses a series of 10 intensity levels (Levels I through X) to provide a more meaningful measure of earthquake severity to the nonscientist than the magnitude scale because it describes the actual effects that might be experienced during an earthquake of a certain magnitude (U.S. Geological Survey 2015). According to the Modified Mercalli scale, earthquakes with magnitudes of 6.0 to 6.9 are characterized as Level VI to VII events causing strong to very strong shaking that is felt by all, with slight to moderate damage to ordinary, well-built structures. Earthquakes of magnitudes of 7.0 to 7.9 are characterized as Level VII to VIII that cause very strong to severe shaking, with moderate to substantial damage to ordinary, well-built structures. Earthquakes with magnitudes of 8.0 or higher are characterized as Level VIII to X events with severe to extreme shaking resulting in substantial structural damage to total structure destruction. Historic moderate to large earthquakes in the region have been Level VI to VII events.

Figure 3.1-2. Subduction Zone Earthquake



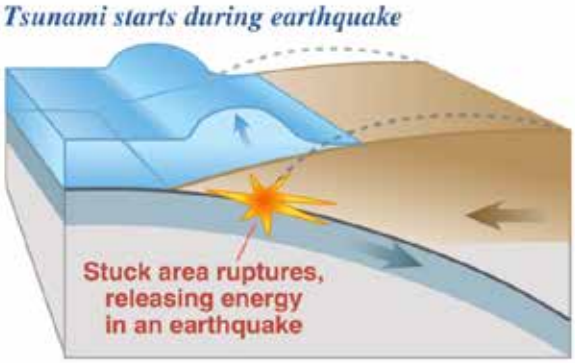
A. Vertical Slice Through a Subduction Zone

One of the many tectonic plates that make up Earth's outer shell descends, or "subducts," under an adjacent plate. This kind of boundary between plates is called a "subduction zone." When the plates move suddenly in an area where they are usually stuck, an earthquake happens.



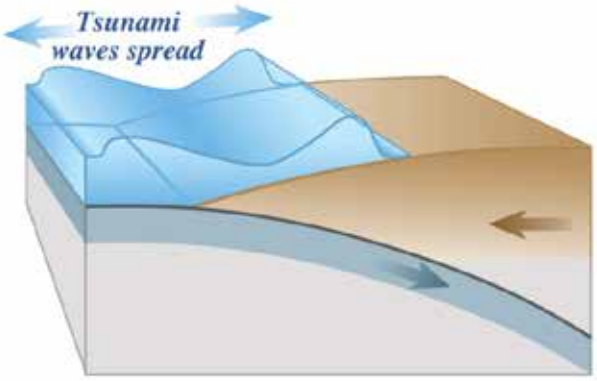
B. Between Earthquakes

Stuck to the subducting plate, the overriding plate gets squeezed. Its leading edge is dragged down, while an area behind bulges upward. This movement goes on for decades or centuries, slowly building up stress.



C. During an Earthquake

An earthquake along a subduction zone happens when the leading edge of the overriding plate breaks free and springs seaward, raising the sea floor and the water above it. This uplift starts a tsunami. Meanwhile, the bulge behind the leading edge collapses, thinning the plate and lowering coastal areas.



D. Minutes Later

Part of the tsunami races toward nearby land, growing taller as it comes in to shore. Another part heads across the ocean toward distant shores.

Source: Atwater et al. 2005

Although no CSZ earthquakes have occurred during the period of written records, there is evidence that they have occurred in recent geologic history. The most recent CSZ earthquake was the 1700 event (Atwater et al. 1995; Jacoby et al. 1997). Its date is known quite precisely (January 26, 1700), because it caused a substantial tsunami in Japan (Atwater et al. 2005).

The probabilities of earthquakes of magnitude 6.0 to 9.0 and greater affecting the study area are shown in Table 3.1-2. In general, the likelihood of an earthquake decreases as the magnitude of the event increases. At the project site, a magnitude 6.0 earthquake has a 30 to 40% likelihood of occurring once in 50 years (i.e., this does not mean that a 6.0 earthquake is expected to occur after 50 years; rather, the likelihood that it could occur during a 50-year window would be 30 to 40% and would be the same likelihood of occurring in any one of those years). An earthquake of magnitude 9.0 or greater has a lower likelihood of occurring, 6 to 8% chance within a 50-year window.

Along the PS&P rail line, which extends 59 miles from Hoquiam to Centralia, the likelihood of an earthquake of a given magnitude varies over that distance, reflecting the change in distance from a given earthquake source. The likelihood of earthquakes of magnitudes of 7.0, 8.0, and 9.0 declines from west to east relative to the distance from the CSZ, the dominant source of these larger earthquakes. The likelihood of an earthquake of magnitude 6.0 initially increases then decreases moving west to east away from the CSZ and into and away from the complex of interrelated faults of the Puget Sound region, the more likely source of earthquakes of this magnitude.

Table 3.1-2. Probability of Stronger Earthquakes in the Study Area

Earthquake Magnitude (Moment Magnitude Scale)	Probability of Occurrence at the Project Site (% within 50-year period and within 31 miles)	Probability of Occurrence Along the PS&P Rail Line (% within 50-year Period and within 31 miles)
6.0 or greater	30–40	30–50
7.0 or greater	12–15	3–15
8.0 or greater	10–12	2–12
9.0 or greater	6–8	1–8

Source: U.S. Geological Survey 2009 generates maps based on zip code, earthquake magnitude, and time span. Note that the source distance of these earthquakes is only 31 miles (50 kilometers) so that it does not fully capture more distant earthquakes such as at the western part of the Cascadia Subduction Zone. Additionally, this website calculator has not been updated for 2014 (Petersen et al. 2014). However, this data still provides a useful comparison of expected earthquake magnitudes by location across the study area. Note that the maps produced for Hoquiam and Elma (approximately halfway between Hoquiam and Centralia) are the same. Consequently, data from the maps generated for Hoquiam are used in the table.

Seismic-Related Effects

CSZ earthquakes are known to cause surface rupture, ground shaking, liquefaction, coseismic uplift and subsidence[5], and tsunamis. These seismic effects are described below.

Surface Fault Rupture

Earthquakes caused by movement within the earth's crust can cause surface fault rupture. Surface fault rupture occurs when the ground moves in two different directions above a fault line that intersects the surface. This movement can damage infrastructure, such as roads or buildings that sit

[5] Coseismic subsidence refers to the lifting and lowering of coastal areas that occurs simultaneous to the earthquake.

atop a fault line. There are no recognized surface-exposed faults that are active or potentially active in the study area (Lidke et al. 2003). The Grays Harbor Fault Zone, located on the sea floor, is the closest fault to the study area. It begins approximately 1 mile offshore to the west of Ocean Shores and runs east-west for approximately 13 miles. This fault has an estimated most recent event of less than 1,500 years ago (Lidke et al. 2003). The seaward edge of the CSZ is about 120 miles to the west of Hoquiam. Because there are no active surface faults located in the study area, the potential for impacts related to surface fault rupture are not discussed further.

Strong Ground Shaking

Large earthquakes can also cause damage through strong ground shaking. Ground shaking is most commonly measured in terms of peak ground acceleration (PGA). PGA is a measure of the earth's acceleration compared to earth's gravity (g) as recorded by seismic instruments. Earth's gravity is 1.0 g. To provide context for the intensity of the movement in terms of how such events feel and what the extent of the damage may be, the Mercalli intensity scale can be used to describe general relationships between PGA and perceived shaking and the potential damage that could occur. According to this scale, PGA in the range of 0.34 to 0.65 g is perceived as severe shaking and could cause moderate to heavy damage, depending on the duration of the event and the structural integrity of affected buildings. PGA in the range of 0.65 to 0.8 g is perceived as violent shaking and would likely cause heavy damage (Petersen et al. 2014).

To characterize the potential risks within an area, USGS develops National Seismic Hazard Maps that show the degree of ground shaking that could occur at various probability levels. These USGS maps inform the design requirements in building codes and other professional standards that apply to the proposed action (Section 3.1.2).

The USGS maps show the expected peak ground movement that could occur as the result of all possible earthquake events within a specific area. The 2014 USGS map shows that, for the study area, there is a 2% probability of an earthquake exceeding a PGA of 0.7 g in a 50-year period. As a generalization, this means that in any 50-year period, there is a 2% chance that an earthquake could occur that would result in severe shaking and moderate to heavy structural damage.

Ground shaking would be strongest in areas underlain by soft soils or unconsolidated deposits such as sand and silt and least in areas underlain by solid rock. The Site Class Map of Grays Harbor County, Washington characterizes the project site as Site Class E, which is the highest level of expected increase of ground shaking due to the type of underlying materials (Palmer et al. 2004). Similar areas of soft soils also occur along the PS&P rail line and would be susceptible to ground shaking in the event of a magnitude 6.0 earthquake or higher.

Liquefaction

Liquefaction occurs when water-saturated, loose sand layers that occur below the ground surface liquefy during strong ground shaking. These liquefied layers can flow like a liquid or lose their strength and consistency such that they cannot support the ground above them. The flowing sediment may erupt to the surface, producing sand boils or sand volcanoes. The liquefied soil layers may also flow laterally and enter waterways. The loss of support for overlying layers may result in these overlying layers subsiding or moving laterally (lateral spreading). Liquefaction also contributes to the loss of bearing capacity for shallow foundations. Subsidence or lateral spreading can damage building foundations or lead to building collapse.

The Hoquiam-Aberdeen area is underlain by sandy gravel, which is susceptible to liquefaction. The Hoquiam-Aberdeen shoreline, including the project site, is mapped as having a high liquefaction hazard (Slaughter et al. 2013); consequently, these areas are susceptible to liquefaction during a strong (6.0 magnitude or greater) earthquake. This high hazard zone extends up to 0.5 mile inland from the shoreline of the harbor.

From Grays Harbor to Centralia, the liquefaction hazard of the majority of the Chehalis River Valley is classified as moderate to high with smaller areas of low and very low risk (Washington State Department of Natural Resources 2014c:natural hazards map). Consequently, earthquakes of magnitude 6.5 to 7.0 or higher could cause liquefaction of the ground surface along much of the PS&P rail line. Earthquakes of magnitude 6.5 to 7.0 would cause localized areas of liquefaction while larger magnitude earthquakes would cause more extensive areas of liquefaction. Liquefaction could also destabilize bridges or other foundations where railroad tracks cross streams. The PS&P rail line has more than 30 stream crossings between Grays Harbor and Centralia. Larger named stream crossings include Van Winkle Creek, Higgins Slough, Wynoochee River, Camp Creek, Satsop River, Newman Creek, Vance Creek, Cloquallum Creek, Mox Chehalis Creek, Porter Creek, Gibson Creek, Cedar Creek, Harris Creek, Roundtree Creek, Black River, Scatter Creek, Prairie Creek, and Skookumchuck River. Although the PS&P rail line parallels and is near the Chehalis River at many locations, it does not actually cross the river.

Coseismic Subsidence

Subduction zone earthquakes are also known to result in extensive coseismic uplift and subsidence, where parallel strips of coastline are lifted or lowered, respectively (Cascadia Region Earthquake Workgroup 2013). In the study area, these motions would occur because of the pre- and post-earthquake interaction between the subducting San Juan de Fuca plate and the overlying North American plate. During a CSZ earthquake, coseismic subsidence would occur almost instantaneously and the land in the study area would drop 5 feet or more. Substantial geologic evidence exists of these events in the Grays Harbor vicinity and in Grays Harbor specifically (Atwater 1992; Shennan et al. 1996; Atwater and Hemphill-Haley 1997; Wang et al. 2013).

As noted above, the most recent CSZ earthquake and associated coseismic subsidence occurred January 26, 1700 (Atwater et al. 1995; Jacoby et al. 1997; Atwater et al. 2005). Wang et al. (2013) review CSZ earthquake subsidence analyses from a wide variety of CSZ sites from northern California to British Columbia. Based on two sites in the Grays Harbor area that they consider to provide the best basis for determining the amount of local coseismic subsidence from the event, Wang et al. (2013) approximate coseismic subsidence of approximately 2 to 5 feet. This subsidence would affect all of Grays Harbor, Hoquiam, Aberdeen, and the lower part of the Chehalis River. Subsidence on this order would increase the depth of the navigation channel and Grays Harbor in general by approximately 5 feet.

Tsunamis

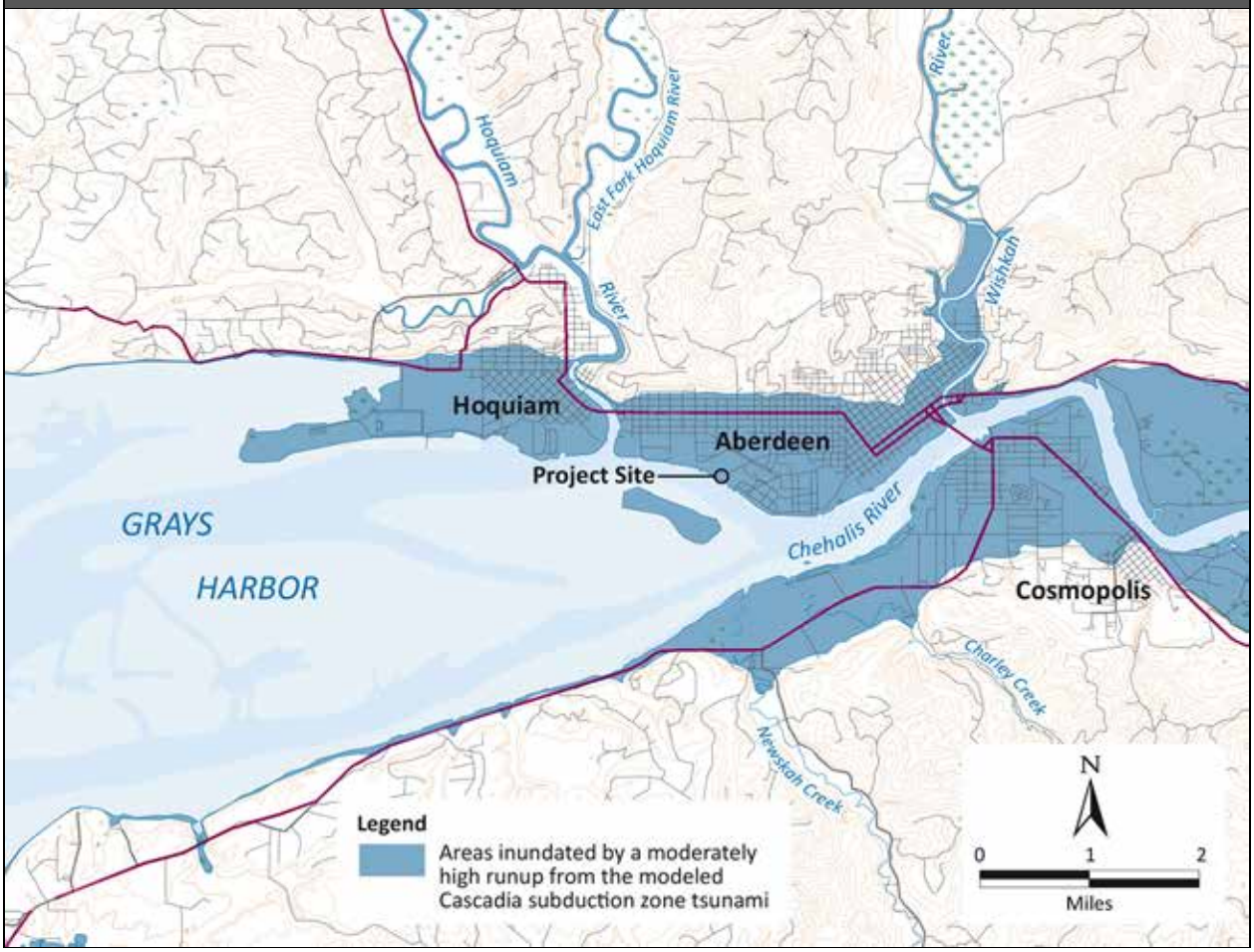
Tsunamis are a train of waves that can be generated during an earthquake by the rapid movement of the sea floor or a lakebed (Figure 3.1-2, Panel D) and even by larger landslides. As mentioned above, there are some areas susceptible to shallow landsliding around the harbor (Slaughter et al. 2013); however, these areas occur near shallow water, resulting in a very low potential for larger waves to occur.

Tsunamis generated by seismic activity in the open ocean have small wave heights at the point of origin but gain height as they enter shallow coastal zones. When reaching the land surface, the tsunami surge wave may travel inland until it loses its momentum. At that point, the water will flow back toward the ocean. A large tsunami may have many waves that reach the shore over a period of hours, and the first wave is generally not the largest wave. Tsunamis are highly destructive because of the weight and velocity of the water combined with the items that are pushed along by the wave (e.g., boats, cars, refrigerators, propane tanks, debris from destroyed buildings). The destruction occurs from both directions as the wave moves inland and then flows back to the ocean.

Tsunamis may reach the Washington coast from several locations; however, the largest potential tsunamis are associated with a CSZ event. Tsunami modeling by Walsh et al. (2000) was used to develop hazard mapping for Washington State to characterize tsunami risks for planning purposes. The modeling was completed for a moderate CSZ earthquake consistent with a 500-year event.[6] The modeling was informed by the best available data at the time of analysis and showed that most of the Grays Harbor communities (including Westport, Ocean Shores, Hoquiam, Aberdeen, and Cosmopolis) would be inundated by a moderately high run-up CSZ tsunami (Figure 3.1-3). Based on the model used to develop the mapping, the first tsunami wave would reach Hoquiam in 1 hour, with a wave elevation above the ground surface of about 2 feet and a maximum height of subsequent waves of about 3.5 feet (Walsh et al. 2000). In contrast, the modeled wave heights at Westport and Ocean Shores on the south and north spits, respectively, at the west end of Grays Harbor, would be over 11 feet and 13 feet, respectively.

[6] A 500-year event means the probability that a moderately powerful CSZ earthquake will occur in any given year is 0.2%.

Figure 3.1-3. Modeled Tsunami Inundation from a Cascadia Subduction Zone Earthquake



Source: Walsh et al. 2000

Since the publication of the state's hazard mapping in 2000, recent tsunami events and advancements in the understanding and methods applied to tsunami modeling have provided for refinement of these estimates. To further inform the risk of tsunamis in the study area, an updated tsunami model was completed (Appendix C, *Tsunami Impact Modeling and Analysis*). The model used in this updated analysis focuses specifically on the study area and extends approximately 200 miles offshore from the project site. Consistent with current practices, the updated model considers a more conservative tsunami event (i.e., a 3,333-year event[7]) than past efforts used to characterize risk, including the state's current hazard mapping. In other words, current practices evaluate the potential for a much larger seismic event (which corresponds with a lower likelihood of occurrence) and incorporate an additional factor of safety[8]. The relative comparison of the likelihood of these two CSZ scenarios and the potential for environmental impacts is shown graphically in Figure 3.1-4. The analysis concluded that the extent of the inundation (i.e., how far inland the tsunami waves

[7] A 3,333-year event means the likelihood that a powerful CSZ earthquake will occur in any given year is 0.03%, or very low. Another way to state this is that a tsunami of this size could occur once every 3,333 years.

[8] With respect to this analysis, application of a factor of safety means the results of the model (i.e., predicted height and forces of the tsunami waves) were subsequently increased (in this case by 1.3 times) to provide an additional "factor of safety." Incorporation of a factor of safety of 1.3 was used to reflect federal requirements since no state or local requirements are available.

reached) would be similar to that shown in the state's hazard mapping but that the larger seismic event could cause a tsunami with wave heights of 23 to 33 feet (North American Vertical Datum of 1988) near the project site. This means that in the event of a large-scale CSZ earthquake, there is a potential tsunami waves (water and debris) reaching the proposed facilities at the project site could be 21 to 26 feet above the ground surface. As noted, the likelihood of an event that would result in waves of this size occurring in any given year is extremely low, or approximately 0.03%. In other words, the chance that a tsunami of this size would not occur would be 97.7% in any given year. For additional information about this analysis, refer to Appendix C*, Tsunami Impact Modeling and Analysis*.

Figure 3.1-4. Risks of Tsunami in the Study Area

Existing tsunami modeling does not extend up the Chehalis River Valley (Walsh et al. 2000; Coast and Harbors Engineering 2014). However, based on the low-elevation topography, there is some tsunami risk for approximately 5 miles up the valley to the vicinity of Montesano. Tsunami wave height and intensity would dissipate rapidly as waves move up the river valley and the risk would decrease commensurately. For example, Walsh et al. (2000) modeled tsunami crests at more than 10 feet at the entrance to Grays Harbor but only 3 feet at Aberdeen. The wave heights east of Aberdeen would be less.

Tsunamis can also be generated by large submarine landslides. These landslides disturb the overlying water and waves radiate out from that location. With sufficiently large landslides, these waves can generate tsunamis when the waves reach shallow water. Although submarine landslides are known to originate from offshore Washington, much of their activity has been correlated with CSZ earthquakes. No non-CSZ earthquake-related tsunamis are known to have been generated from submarine landslides on the outer Washington coast. Submarine landslide-generated tsunamis are not discussed further.

Volcanic Activity

Two active volcanoes are present in the Cascade Range approximately 100 miles to the east of Hoquiam and about 50 miles to the east and southeast of Centralia. Volcanic hazards at these distances would be from the air fall of volcanic ash and from volcanic mudflows that would flow

down volcano slopes into, and then down, adjacent rivers. The project site is outside the lowest probability level of the accumulation of 4 or more inches of volcanic ash from a Cascade volcano eruption (Wolfe and Pierson 1995). The eastern parts of the Chehalis River Valley have an even lower risk of experiencing substantial ash fall (0.01 and 0.02%) (Wolfe and Pierson 1995) and volcanic activity would not be likely to affect rail operations in the area.

Volcanic mudflows from the 1980 Mount St. Helens volcanic eruption flowed from the volcano into the Toutle River and downstream into the Cowlitz River as far as the Columbia River (Haini 1983). However, no mudflows reached the Chehalis River. Based on past evaluations, it is unlikely mudflows from Mount Rainier would reach the Chehalis River (Cakir and Walsh 2012) and are not likely to reach the PS&P rail line.

Based on the above information, volcanic hazards would not affect the project site, the PS&P rail line, or navigation in the navigation channel or offshore. Volcanic hazards are not discussed further.

3.1.5 What are the potential impacts related to earth resources and conditions?

This section describes the impacts related to earth resources and conditions that could occur in the study area. Potential impacts of the no-action alternative are described first, followed by potential impacts of the proposed action.

3.1.5.1 No-Action Alternative

Under the no-action alternative, impacts related to earth resources from the construction of the proposed action would not occur. The applicant would continue to operate its existing facility as described in Chapter 2, Section 2.1.2.2, *Existing Operations*. Although the proposed action would not occur, it is assumed that growth in the region would continue under the no-action alternative, which could lead to development of another industrial use at the project site within the 20-year analysis period (2017 to 2037). Such development could result in in impacts similar to those described for the proposed action.

As described in Section 3.1.4.3, *Geologic Hazards*, there is a potential for larger magnitude earthquakes and earthquake-related hazards to occur in the study area. Under the no-action alternative, because no new facilities or operational changes would occur, there would be no increased exposure to risk of damage related to these events compared with existing conditions.

Under the no-action alternative, geologic events, including landslides, earthquakes, ground shaking, liquefaction, coseismic subsidence, and tsunamis would continue to have the potential to disrupt existing rail service and cause incidents and derailments if the events were strong enough. Specifically, ground shaking associated with a magnitude 6.5 earthquake or higher could destabilize the tracks (because of liquefaction) or cause incidents, including possible derailments. This would be most likely to occur in areas where the PS&P rail line is located on looser soils. As discussed above, this occurs primarily closest to the project site and in areas where the PS&P rail line comes closer to the Chehalis River floodplain in areas closer to Centralia. Much larger events (CSZ event of magnitude 9.0 or greater) could also result in coseismic subsidence that could affect portions of the PS&P rail line in Hoquiam and Aberdeen and the lower part of the Chehalis River. These same areas could also be affected by tsunami waves that could be large and powerful enough to destabilize the tracks and cause train derailments.

Under the no-action alternative, large magnitude CSZ events could affect existing vessel traffic in the harbor. If large enough, tsunami waves could move vessels located in the harbor and cause incidents as vessels came into contact with one another or with debris. As discussed in Section 3.1.4.3, *Geologic Hazards,* depending on the magnitude of the event, tsunami waves between 3 to 26 feet in height could reach the project site.

3.1.5.2 Proposed Action

This section describes the impacts that could occur in the study area as a result of construction and routine operation of the proposed action. This section also addresses potential impacts of broader geologic conditions on the proposed action and the transportation systems that would support it. First, this section describes impacts from construction of the proposed action. It then describes impacts of routine operation at the project site and of routine rail and vessel transport to and from the project site.

Construction

Construction of the proposed action could increase erosion and soil instability from earthwork (e.g., excavation, filling, site grading). The proposed action would develop an additional 10.9 acres at the site. Approximately 314,000 square feet (7.2 acres) would be graded. Approximately 77,000 cubic yards of material would be removed and 23,000 cubic yards filled.

Construction activities would expose bare soil during ground disturbance and could result in the need to temporarily stockpile soil. This would increase the potential for erosion from wind or surface-water runoff and for loose soils to enter waterways, resulting in water quality concerns. Potential water quality impacts associated with sedimentation are discussed in Section 3.3, *Water*.

As mentioned previously, the potential for increased erosion on the project site is low because the site is relatively flat, and because sandy, gravely soils have a low erosion potential. Additionally, the proposed action would be required to obtain a General Permit for Stormwater Discharges Associated with Construction Activities (National Pollutant Discharge Elimination System Construction Stormwater General Permit) and to develop and implement a stormwater pollution prevention plan. Implementation of best management practices consistent with the Stormwater Management Manual for Western Washington (Washington State Department of Ecology 2012) would reduce the potential for erosion and sedimentation during construction. No geologic or soil conditions at the project site suggest that such erosion control and best management practices would not be effective in reducing environmental impacts.

Although there would be small, temporary areas where soils would be stockpiled and some cut slopes, no large areas of steep slopes would be created. Therefore, construction of the proposed action would not result in the potential for increased soil instability such as landslides that could occur because of steeper slopes. Additionally, once contoured, the site would be paved, which would limit the potential for further soil movement.

Operations

This section describes impacts that would occur as a result of routine operations at the project site, rail transport along the PS&P rail line, and vessel transport through Grays Harbor.

Onsite

Landslides and Slope Instability

There is no potential for natural landslide instability to affect the project site during operations.

Earthquakes and Related Hazards

As discussed in Section 3.1.4.2, *Geology and Soil Conditions*, the project site is located in an area that has the potential for moderate to severe earthquakes to occur. The extent of the damage would depend on the magnitude of the event, but should a CSZ earthquake of magnitude 9.0 or higher occur, the following hazards would also occur: intense ground shaking (PGA) in the range of 0.7 g, liquefaction and ground settling of 6 to 12 inches, coseismic subsidence on the order of 2 to 5 feet, and tsunamis that could affect the project site. Although the potential for these events to occur would remain the same compared to the no-action alternative, there could be increased risk of damage to the newly proposed occupied office buildings, storage tanks, and related infrastructure if the appropriate design standards were not met.

Prior to construction, the applicant would be required to obtain the appropriate building permits and approvals from the Cities of Hoquiam and Aberdeen. This would require final design of the proposed action to be consistent with the building codes and standards described in Section 3.1.2. Compliance with those regulations would ensure that the proposed office structures and storage tanks meet the design standards required to reduce the risk of property and personal damage to acceptable levels.

In addition to meeting the general minimum standards, these regulations require site-specific assessments to be completed and any additional mitigation measures to be implemented to ensure risks related to geologic hazards are adequately reduced. As mentioned previously, a site-specific evaluation was completed in 2006 by GeoEngineers. The analysis considered PGA and ground settling factors for the project site and applied the International Building Code (2003) and American Society of Civil Engineers 7-02, as the basis of making additional design recommendations. Note that since the preparation of the GeoEngineers (2006) report, the International Building Code has been updated (2009, 2012) and the American Society of Civil Engineers 7-02 has been changed to 7-05 (which incorporates International Building Code 2009). These measures would be required to adequately reduce the risks at the construction phase for future operations of the proposed office buildings and storage tanks.

The consideration and implementation of geotechnical engineering and structural design for a project is an iterative and ongoing process, during which varying levels of investigation and analysis are performed to identify and address the potential impacts associated with a project commensurate with its stage in development. Therefore, prior to receiving the final building permits, the applicant would need to ensure the geotechnical evaluation considered the most current applicable information and standards. Implementation of measures identified during investigations specific to the proposed action and any others identified during subsequent investigations would be required to adequately reduce the risks of the proposed action.

As discussed in Section 3.1.4.2, *Geology and Soil Conditions*, the project site is located in an area that has the potential to be inundated by tsunami waves. The extent of damage would vary with the magnitude of the seismic event, the tidal level at the time for the earthquake, the current state of sea-level rise, and the amount of debris (from ships or buildings) that may be traveling with the wave. Although the risk of tsunami is unchanged with or without the proposed action, construction

of new facilities associated with the proposed action would expose additional structures and workers to potential harm. However, if a tsunami were to occur, current analyses indicate there would be approximately 1 hour for onsite personnel to evacuate. Therefore, the development and implementation of the emergency evacuation plan described in Section 3.1.7.2, *Applicant Mitigation*, would help to reduce this impact.

Depending on the magnitude of the event, the new storage tanks could also become damaged and contribute to the tsunami debris, or rupture and result in a leak of bulk liquids into the environment. Although the proposed action is expected to be designed and constructed to the currently required minimum design standards, these standards (as defined by the International Building Code, adopted through State Building Code [RCW 19.27] and City Building Codes [HMC 2.08 and AMC 15.08]) do not require consideration of site-specific tsunami risks. To address this, the mitigation discussed in Section 3.1.7.2, *Applicant Mitigation*, identifies the specific forces that should be considered during the design of the proposed facilities to reduce potential impacts related to a tsunami event.[9]

Rail

Although the proposed action would not result in any modifications to the PS&P rail line that would directly affect soils or geological resources, geological events could affect increased rail traffic and safety under the proposed action. Potential events that could affect the PS&P rail line include landslides, earthquakes, and other seismically related events, such as liquefaction, coseismic subsidence, and tsunamis. The potential impacts associated with incidents along the rail line are addressed in Chapter 4, *Environmental Health and Safety*.

Landslides and Slope Instability

As discussed in Section 3.1.4.3, *Geologic Hazards*, approximately 19 miles of the 59-mile (about 32%) PS&P rail line are located within 10 to 280 feet of moderate to steep slopes and hillsides. In these locations, the rail line is susceptible to damage from landslides. Although the risk of a landslide occurring in this portion of Washington is moderate because of the presence of steep slopes, unstable soils, high regional rainfall, and a relatively long rainy season, the potential for such events to derail a passing train is low. For approximately 12 of the 19 miles (about 63%) that the rail line is adjacent to steep or unstable slopes, it is separated from the adjacent hillslope by US 12, a two-lane highway that is between 40 to 70 feet wide and often divided by a concrete barrier, as well as a vegetated median of varying width. Based on data obtained from WSDOT's Unstable Slopes Management Program, debris flows from the majority of the known unstable slopes upslope of the highway are not expected to impede more than half of the roadway width (Fish pers. comm.). Consequently, it is unlikely that landslide debris from these locations could reach the PS&P rail line. In the two locations where potential debris flows from unstable slopes are expected to impede the entire width of the roadway, the PS&P rail line is an additional 25 to 50 feet away from the edge of the road. Although debris flows from landslides in these locations could reach the rail line, the likelihood that such events could hit and derail a train is low, as these areas only account for approximately 0.1 mile (about 0.2%) of the 59-mile PS&P rail line in the study area.

[9] As discussed in Section 3.1.4.3, *Geologic Hazards*, the updated analysis of tsunami risks specific to the project site considers a risk scenario consistent with a more conservative 3,333-year event and an additional 1.3 factor of safety. Although not currently required by state or local regulations, these assumptions would be applied following guidance presented in Appendix M of the International Building Code, which documents voluntary standards.

In the three locations along the rail segment between Aberdeen and MP 2.5 of US 12, WSDOT identified unstable slopes between the highway and PS&P rail line (Trople pers. comm.). Debris flows from landslides in these locations could reach the rail line, as it is located close (approximately 10 feet) to the toe-of-slope in some locations. The potential for this to occur is relatively low, as these areas occur along only 0.23 mile (about 0.4%) of the 59-mile PS&P rail line in the study area.

Because there would be an increase in the number of trains traveling within this corridor under the proposed action, these risks would be similar to, but slightly greater than under the no-action alternative. Specifically, operation of the proposed action at maximum throughput would result in approximately two unit train trips per day, on average, along the PS&P rail line, compared to an average of three train trips per day under the no-action alternative. The increased frequency of travel could result in a slight increase in the exposure of people and property to harm from derailment incidents caused by landslides. The increased risks of exposure of the environment to crude oil or other proposed bulk liquids (e.g., oil spills or explosions from train accidents) directly attributable to the proposed action are discussed in Chapter 4, *Environmental Health and Safety*.

Earthquakes and Related Hazards

As discussed in Section 3.1.4.3, *Geologic Hazards,* the PS&P rail line is located in an area that has the potential for moderate to severe earthquakes to occur. The extent of the damage would depend on the magnitude of the event, but should a CSZ earthquake of magnitude 9.0 or higher occur, the following hazards would also occur: intense ground shaking (PGA) in the range of 0.7 g, liquefaction, coseismic subsidence near Hoquiam and Aberdeen, and exposure to tsunami waves that could affect portions of the rail line closest to Hoquiam and Aberdeen. Events of this magnitude would have the potential to cause damage the rail line and trains to derail.

Because there would be an increase in the number of trains traveling within this corridor under the proposed action as described above, these risks would be similar to, but slightly greater, than under the no-action alternative. The increased frequency of travel could result in a slight increase in the exposure of people and property to harm from derailment incidents caused by earthquakes and earthquake-related hazards, such as those described above. The increased risks of exposure of the environment to crude oil or other proposed bulk liquids (e.g., oil spills or explosions from train accidents) that would be directly attributable to the proposed action are discussed in Chapter 4, *Environmental Health and Safety*.

Vessel

Although the proposed action would not result in modifications to the harbor that would directly affect soils or geological resources, vessel operations could result in the slight increased potential for shoreline erosion associated with vessel wake. Additionally, potential geological events, specifically earthquake-related hazards of coseismic subsidence and tsunamis, could affect increased vessel traffic and safety under the proposed action.

Landslides and Slope Instability

Increased vessel traffic related to the proposed action could result in a slight increase in erosion within the navigation channel and along the shoreline as the result of propeller wash or vessel wake. A ship's propeller generates a continuous stream of fast-moving water known as a propeller-induced jet (AMOG Consulting 2010:5). When a propeller-induced jet impinges directly on a seabed or channel bottom, it can resuspend soft bottom sediments, cause the erosion of channel banks and

cut-lines, and physically damage aquatic vegetation and benthic communities. This is referred to as *propeller wash* and its effects are determined by a number of parameters including the depth of the waterbody; number, type, and diameter of propellers; distance between propellers and the seabed or channel bottom; size of the vessel; engine power; and maneuvering speed, among other factors. Potential effects of propeller wash on water quality and critical saltwater habitat are described in Section 3.3, *Water*, and Section 3.4, *Plants*, respectively.

Large tankers would be more likely to create turbulence that can erode bottom sediments than tugs or because the large propellers on these vessels are closer to the channel bottoms. The potential for increased erosion could be reduced if vessels were to call during higher tides (as discussed in Section 3.17, *Vessel Traffic*) because increased channel depth would increase the distance between the vessel's propeller and the channel bottom. Additionally, vessels associated with the proposed action are likely to be escorted into the harbor and maneuvered around the Terminal 1 dock and the turning basin by tugs, which have smaller propellers that operate nearer the surface, reducing the potential for propeller wash to impinge on the channel bottom and sides. However, as tugs maneuver a large vessel, they may create wakes perpendicular to the vessel and the navigation channel.

Vessel wake or waves caused by vessels transiting the harbor could increase shoreline erosion if large enough waves were to reach the shoreline with increased frequency and sufficient intensity to accelerate erosion. The location and extent of vessel wake effects would depend on a variety of factors, including climatic conditions, tidal conditions, vessel type, vessel location, and vessel speeds.

Operation of the proposed action at maximum throughput would add 400[10] tank vessel trips[11] through the harbor per year to the 436 large commercial vessel[12] trips under the no-action alternative (Section 3.17, *Vessel Traffic*). These additional trips would result in a small, incremental increase in the potential for impacts associated with wake compared to the no-action alternative. The implications of increased vessel wake are addressed in Section 3.3. *Water*, Section 3.4, *Plants*, and Section 3.5, *Animals*.

Additionally, and as discussed in Section 3.1.4.2, *Geology and Soil Conditions*, there is the potential for localized landslides around the harbor; however, these areas are located away from Terminal 1 and would not be large enough to affect vessel traffic within the harbor.

Earthquakes and Related Hazards

As discussed in Section 3.1.4.2, *Geology and Soil Conditions*, Grays Harbor and the area where vessels would travel out to 3 nautical miles from the mouth of the harbor is located in an area that has a potential for moderate to severe earthquakes. Although unlikely, these events could affect vessel traffic and waterway safety if the event was large enough to result in large waves, including tsunamis that could cause vessels to collide with one another or even to run aground in shallower areas.

Operation of the proposed action at maximum throughput would add one tank vessel trip per day on average to the one large commercial vessel trip per day under the no-action alternative (Section

[10] Proposed vessel trips are total for the facility so are not in addition to trips attributable to the applicant under the no-action alternative (approximately 14 per year).

[11] A trip represents one-way travel; in other words, an inbound trip and an outbound trip are counted as two trips.

[12] The term *large commercial vessels* refers collectively to tank and cargo vessels.

3.17, *Vessel Traffic*). Because there would be an increase in the number of vessels traveling in this corridor under the proposed action, these risks would be similar to, but slightly greater, than under the no-action alternative. The increased frequency of travel could result in a slight increase in the exposure of people and property to harm from earthquakes and earthquake-related hazards, such as those described above. The increased risks of exposure of the environment to crude oil or the other proposed bulk liquids (e.g., oil spills related to vessel accidents) that would be directly attributable to the proposed action are discussed in Chapter 4, *Environmental Health and Safety*.

3.1.6 What required permits apply to earth resources and conditions?

The following permit conditions and required plans are expected to reduce impacts related to earth resources and conditions.

- City of Hoquiam and City of Aberdeen Critical Areas Reviews for fish and wildlife habitat and geologically hazardous areas
  - Critical area review report
  - Buffer establishment and protection requirements
  - Buffer mitigation and monitoring requirements
  - Buffer activity limits and restrictions
- City of Hoquiam and City of Aberdeen Building Permits
  - Requirement for compliance with American Society of Civil Engineers 7 and American Petroleum Institute 650 design and construction standards, including climatic and geologic loading requirements
  - Erosion control plan
  - Geotechnical report
  - Shoreline substantial development permit
  - Critical areas review
- City of Hoquiam and City of Aberdeen Grade and Fill Permits

3.1.7 What mitigation measures would reduce impacts related to earth resources and conditions?

This section describes the applicant mitigation that would reduce impacts related to earth resources from construction and routine operation of the proposed action

3.1.7.1 Applicant Mitigation

The applicant will implement the following mitigation.

- To minimize the potential for impacts at the project site related to unstable soils, the applicant will review and update the construction mitigation measures identified in GeoEngineers (2006) and discussed in GeoEngineers (2014). These measures for site preparation and construction will be implemented during construction.

  - Over-excavate the existing soil and compact the exposed soil to a uniformly firm and unyielding condition prior to placement of fill.
  - Based on existing site grades and proposed development, standard erosion control measures are considered adequate; however, if construction and grading are staged, slopes may be created that require additional erosion control measures.
  - For railroad spurs on site, support, over-excavate, and recompact materials so that there is a minimum of 2 feet of compacted fill.
- To minimize the potential for damage to the storage tanks related to geologic risks and unstable soils, the applicant will install pile-supported foundations that extend up to 75 feet deep for storage tanks to avoid excessive settlement from potentially liquefiable materials.
- To minimize the potential for damage to the storage tanks related to geologic risks and unstable soils, the applicant will develop final design specifications for proposed structures based on evaluation of the following more current standards/information (some of which were identified in GeoEngineers 2014).
  - U.S. Geological Survey ground-shaking report and maps released in July 2014 (Petersen et al. 2014).
  - American Petroleum Institute Standard 650 (2012).
  - International Building Code 2012.
- The applicant will ensure that a tsunami evacuation and emergency management plan is prepared prior to beginning project operations. This plan will consider evacuation planning, identification of safe havens, and identification of evacuation routes to natural high ground and will be developed in coordination with emergency management officials (City of Hoquiam, Grays Harbor County, Washington State, U.S. Coast Guard, ship captains, and pilots).

To reduce the potential for environmental damage related to a tsunami event, the applicant will conduct a study to assess the technical feasibility and cost of implementing measures to construct the proposed facilities to withstand a CSZ L1 tsunami wave based on the Scenario 2 inputs listed in Table 4 of the Tsunami Impact Modeling and Analysis (Appendix C). Agreed upon measures will be implemented prior to project design and construction in coordination with the co-lead agencies.

3.1.8 Would the proposed action have unavoidable and significant adverse impacts on earth resources and conditions?

Although the likelihood of a large-scale tsunami event is low, such an event would likely cause unavoidable and significant adverse environmental effects at or near the site if it occurred and the facility was not constructed to withstand it. The potential impacts in the event of a large scale tsunami would include oil spills, fires, or explosions which are discussed in Chapter 4, *Environmental Health and Safety*.

3.2 Air

Clean air is vital to human health and is a resource protected by federal, state, and local regulations. Pollutants in the air can negatively affect humans, plants, animals, and human-made structures. Ambient (outdoor) air is affected by climate, topography, meteorological conditions, and airborne pollutants produced by natural or artificial sources.

This section describes the existing air quality in the study area. It then describes impacts on air quality that could result under the no-action alternative or as a result of the construction and routine operation[1] of the proposed action. Finally, this section presents any measures identified to mitigate impacts of the proposed action and any remaining unavoidable and significant adverse impacts.

3.2.1 What is the study area for air quality?

The study area for air quality consists of air quality on and near the project site that could be affected by construction and routine operation at the project site. The study area also includes air quality that could be affected during routine rail transport along the Puget Sound & Pacific Railroad (PS&P)[2] rail line and vessel transport through Grays Harbor out to 3 nautical miles from the mouth of the harbor.

The study area for greenhouse gas (GHG) emissions information includes the project site and emissions related to rail and vessel emissions in Washington State.

3.2.2 What laws and regulations apply to air quality?

Laws and regulations for determining potential impacts on air quality are summarized in Table 3.2-1. More information about these laws and regulations is provided in Appendix B, *Laws and Regulations*.

[1] Chapter 4, *Environmental Health and Safety*, addresses the potential impacts from increased risk of incidents (e.g., storage tank failure, train derailments, vessel collisions) and related consequences (e.g., release of crude oil or other proposed bulk liquids).
[2] The PS&P rail line refers to the rail line between Centralia and the project site.

Table 3.2-1. Laws and Regulations for Air Quality

Laws and Regulations	Description
Federal	
Clean Air Act of 1963 (42 U.S.C. 7401 et seq.)	Regulates the nation's air emissions through the enforcement of the National Ambient Air Quality Standards for criteria air pollutants in the ambient (outside) air. In 2007, the U.S. Supreme Court ruled to regulate GHG emissions as air pollutants under the CAA.
State	
Clean Air Act (RCW 70.94)	Regulates stationary sources of emissions to protect air quality.
Controls for New Sources of Toxic Air Pollutants (WAC 173-460)	Establishes the systematic control of new or modified sources emitting toxic air pollution to prevent air pollution, reduce emissions, and maintain air quality that will protect human health and safety.
Reporting of Emissions of Greenhouse Gases (WAC 173-441)	Establishes mandatory GHG reporting requirements for owners and operators of certain facilities that directly emit GHGs at a rate of 10,000 $MTCO_2e$ per year or greater.
Limiting Greenhouse Gas Emissions (RCW 70.235)	Establishes statutory reductions of overall GHG emissions and report emissions to the governor bi-annually. The first target statutory reduction is to achieve 1990 level GHG emissions by 2020 and 50% below 1990 levels by 2050 (or 70% below the State's expected emissions that year).
Local	
No local laws or regulations apply to air quality.	

U.S.C. = United States Code; GHG = greenhouse gas; CAA = Clean Air Act; RCW = Revised Code of Washington; WAC = Washington Administrative Code; $MTCO_2e$ = metric tons of carbon dioxide equivalent.

3.2.3 How were impacts on air quality evaluated?

This section describes the sources of information and methods used to evaluate impacts.

3.2.3.1 Information Sources

The following sources provided information on air quality.

- National Weather Service.
- State and federal air quality regulations and emissions levels (Table 3.2-1).
- NW AIRQUEST, a tool developed by Washington State University's Northwest International Air Quality and Environmental Science and Technology Consortium.
- The applicant's Olympic Region Clean Air Agency air permit application materials, including air dispersion modeling files (2013).
- The U.S. Environmental Protection Agency (EPA) EPA MOVES 2010 model.
- California Air Resources Board vessel transit emissions study (2008).

The following sources provided information on GHG emissions.

- World Resources Institute GHG emission information.

- Washington State Department of Ecology (Ecology) state GHG emissions inventory (2014a).
- Intergovernmental Panel on Climate Change Fifth Assessment Report (2013)World Resources Institute Climate Analysis Indicators Tool.
- Council on Environmental Quality draft guidance on considering climate change in National Environmental Policy Act (NEPA) reviews.

3.2.3.2 Impact Analysis

The air analysis involved two distinct parts: a quantitative analysis of the contribution of the criteria air pollutants and GHG emissions, and a qualitative discussion of the potential impacts of criteria air pollutants and toxic air pollutants on air quality in the study area. The analysis considered emissions over the course of the 20-year analysis period (2017 to 2037) and noted differences in the results where applicable.

The quantitative analysis of the contribution of criteria air pollutants and GHG emissions included the emissions from construction and routine operation of the proposed action in the study area. Air pollutant emissions from the following sources were quantified.

- Use of equipment to construct the proposed facilities (Chapter 2, Section 2.1.4, *Construction Schedule and Methods*).
- Onsite operations, including emissions from stationary sources[3] (including the marine vapor combustion unit), vehicles, rail switching operations,[4] and vessels at dock.[5]
- Rail transport[6] along the PS&P rail line. GHG emissions along the rail route in Washington State were also considered.
- Vessel transport[7] to 3 nautical miles from the mouth of Grays Harbor.

Emission calculations from these sources were based on the estimated hours of operation, types of equipment, and types of fuel consumed. Emissions were considered in the context of Grays Harbor County emissions.

The qualitative discussion of the effect of emissions of toxic air pollutants on sensitive receptors was informed by determining the emissions from onsite operations including rail and vessel emissions during loading and unloading. The toxic air pollutants with the potential to exceed Washington State Small Quantity Emission Rates, as identified in Controls for New Sources of Toxic Air Pollutants (Washington Administrative Code [WAC] 173-460), were assessed through dispersion modeling to demonstrate the ambient level of each toxic pollutant with respect to its acceptable source impact level (ASIL).[8]

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[3] Based on the estimated hours of operation, types of equipment, and types of fuel consumed based on information provided in the air permit applications.
[4] From the locomotive engines while moving cars and while idling during switching and unloading.
[5] From auxiliary engines used to internally power the shipboard electricity, pumps, bilge, etc.
[6] Based on the travel speeds and fuel consumption while loaded and unloaded, and small railroad fleet turnover changes over the 20-year planning period.
[7] From engines of tank barge (barge auxiliary engine and tug engine), assist tugs, and escort tugs based on the typical travel speeds and fuel consumption while arriving (unloaded) and departing (loaded).
[8] Washington State Department of Ecology has established acceptable source impact levels (ASIL), which are screening concentrations of toxic air pollutants in the ambient air.

3.2.4 What is the air quality in the study area?

This section describes the climate and air quality in the study area. This section also describes sensitive air quality receptors.

3.2.4.1 Climate

The climate in Grays Harbor is characterized by mild temperatures, year-round rainfall with peaks in the winter, and strong coastal winds. Temperature and precipitation records from 1891 to 2013 for the Aberdeen National Weather Service Cooperative Station show that monthly temperatures are lowest in January when the average monthly lows are 34.6°F. August is typically the warmest month with an average monthly maximum temperature of 69.8°F. Aberdeen experiences an average of about 8.6 inches of annual snowfall. Most of the precipitation falls as rain with an annual average of 83.20 inches. Average monthly rainfall over the period of record ranges from 1.21 inches in July to 13.44 inches in December. The region experiences strong coastal winds, while inland wind speeds are typically weaker. Appendix D, *Air Data*, describes climate in the study area in more detail.

3.2.4.2 Existing Air Quality

Grays Harbor County is designated an attainment area for criteria air pollutants, which means that air quality meets the federal and state health-based ambient air quality standards.

Particulate matter is the primary air pollutant at the project site. However, the highest measured 24-hour concentration nearest to the project site was well below the air quality standard for particulate matter of 2.5 micrometers or less (PM2.5).[9] The primary sources emitting particulate matter in the vicinity are home heating, trucks, fishing vessels, and commercial cargo vessels.

Background concentrations of other criteria pollutants at the project site were estimated using NW AIRQUEST.[10] Table 3.2-2 shows the criteria pollutant concentrations estimated for the project site and their percentage of the current national or state (whichever is more stringent) ambient air quality standard.

[9] As shown in Appendix D, *Air Quality Conditions*, the highest 24-hour average PM2.5 concentration from January 1, 2010 to June 30, 2014, was 18 micrograms per cubic meter ($\mu g/m^3$)(January 2014), well below the PM2.5 air quality standard of 35 $\mu g/m^3$.

[10] NW AIRQUEST was developed by Washington State University's Northwest International Air Quality and Environmental Science and Technology Consortium (2013) as sponsored by EPA Region 10, Washington State Department of Ecology, and others. The work developed background design value estimates for 2009 to 2011 based on model-monitor interpolated products that provide realistic background design value estimates where nearby ambient monitoring data are unavailable. More information about the NW AIRQUEST tool can be found at http://www.lar.wsu.edu/nw-airquest/lookup.html.

Table 3.2-2. Modeled Concentrations of Criteria Air Pollutant at the Project Site and Percentage of Air Quality Standard

Pollutant Parameter	Modeled Concentration[a]	Percentage of National or State Ambient Air Quality Standard[b]
PM2.5 24-hour	6.9 μg/m^3	20 %
PM2.5 annual	3.5 μg/m^3	29 %
O_3 daily 8- hour maximum	51 ppb	68%
NO_2 1-hour	21 ppb	21%
NO_2 annual	1.9 ppb	3.6%
SO_2 1-hour	5.1 ppb	6.8%
SO_2 3-hour	3.3 ppb	0.7%
SO_2 24-hour	1.1 ppb	0.8%
SO_2 annual	0.6 ppb	3.0%
CO 1-hour	532 ppb	1.5%
CO 8-hour	420 ppb	4.7%
PM10 24-hour	25 μg/m^3	17%

[a] Northwest AIRQUEST 2009-2011 design value
[b] Whichever is more stringent.
PM2.5 = particulate matter with a diameter of 2.5 micrometers or less; μg/m^3 = micrograms per cubic meter; ppb = parts per billion; O3 = ozone; NO_2 = nitrogen dioxide; SO_2 = sulfur dioxide; CO = carbon monoxide; PM10 = particulate matter with a diameter of 10 micrometers or less; ppb = parts per billion

3.2.4.3 Sensitive Receptors

Sensitive air quality receptors were defined to determine potential air quality impacts at the receptors. Sensitive air quality receptors were defined as a facility or land use that houses or attracts members of the population who are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of sensitive receptors include schools, hospitals, day care centers, convalescent facilities, senior centers, and parks or recreational facilities. These types of facilities and land uses are located near the project site, along the PS&P rail line between Centralia and the project site, and along the shoreline of Grays Harbor. The following sections identify sensitive receptors at the project site, along the PS&P rail line, and along the shoreline of Grays Harbor.

Project Site

Because emissions of toxic air pollutants and criteria air pollutants would be the highest at and near the project site from rail, vessel, and project site operations, the greatest potential for impacts on sensitive receptors would be near the project site.

There are 22 sensitive receptors within 1 mile of the project site (Table 3.2-3). The closest sensitive receptors to the project site are the 28th Street Landing boat launch and 28th Street Viewing Tower (immediately west and adjacent to the project site along the Grays Harbor shoreline), and the West End Playfield (approximately 0.3 mile from the project site).

Table 3.2-3. Sensitive Receptors within 1 Mile of the Project Site[a]

Name of Facility	Type of Facility	Approximate distance from Project Site (mile)
28th Street Landing - Viewing Tower	Park	<0.1
28th Street Landing	Park	<0.1
West End Playfield	Park	0.3
Anna's Playhouse	Child care facility	0.4
Pacific Ave Play Park	Park	0.5
Pacific Care and Rehabilitation Center	Health care facility	0.6
Wunderland Childcare Inc. #4	Child care facility	0.6
Washington Elementary School	School	0.6
Grays Harbor Podiatry Clinic	Health care facility	0.6
YMCA of Grays Harbor	Facility	0.6
Olympic Stadium	Park	0.6
Grays Harbor County RSN	Health care facility	0.6
Batting Cages at Olympic Stadium	Park	0.7
A.J. West Elementary School	School	0.7
Hallak Medical Group	Health care facility	0.7
Grays Harbor Community Hospital	Health care facility	0.8
Sea Mar Aberdeen Medical	Health care facility	0.8
Harborean	Roller skating rink	0.8
Family Medicine Grays Harbor	Health care facility	0.9
Harbor Internal Medicine Clinic	Health care facility	0.9
Grays Harbor Farmer's Market	Farmer's market	1.0
Harbor High School	School	1.0

[a] The sensitive receptors were identified using internet data sources and were not field-verified.

PS&P Rail Line

Sensitive receptors within 0.25 mile of the PS&P rail line are presented in Table 3.2-4.

Table 3.2-4. Sensitive Receptors within 0.25 Mile of the PS&P Rail Line[a]

Name	City
Child/Day Preschool Care	
Snug Harbor Child Care Center	Aberdeen
Creative Hands Child Care	Aberdeen
Central Park Co-Op Preschool	Aberdeen
Careland Playschool	Montesano
Montesano Co-Op Preschool	Montesano
Tee Time Playschool	Montesano
Raykowski Eileen Day Care	Montesano
Learning To Grow Child Care	Elma
Prairie Patch Preschool	Rochester
Precious Years	Rochester
Dell's Children's Center	Centralia
Schools	
Central Park Elementary School	Aberdeen
Beacon Avenue Elementary School	Montesano
Satsop Elementary School	Elma
Hunters Prairie School	Elma
Elma Elementary School	Elma
Elma High School	Elma
East Grays Harbor High School	Elma
Elma Middle School	Elma
Elma Head Start	Elma
Oakville High School	Oakville
Oakville Elementary School	Oakville
Rochester Head Start	Rochester
Rochester Middle School	Rochester
Rochester High School	Rochester
Rochester Primary School	Rochester
Rochester Elementary School	Centralia
Maple Lane High School	Centralia
Hospital/Medical Facilities	
Summit Pacific Medical Center	Elma
NW Indian Treatment Center	Elma
Senior Centers/Skilled Nursing	
Avalon Healthcare	Aberdeen
Silvia Center (long term/hospice care)	Montesano
Montesano Senior Center	Montesano

Name	City
Parks	
Gladys Smith Park	Elma
Lloyd Murrey Park	Elma
Oakville Baseball Field	Oakville
Oregon Trail Park	Centralia

[a] The sensitive receptors were identified using internet data sources and were not field-verified.

Grays Harbor

There are several communities along the shoreline of Grays Harbor. The vessels calling at the project site would traverse a more southerly route, avoiding the shoreline along most of the route. Table 3.2-5 shows 12 sensitive receptors within 0.5 mile of the shoreline along the southern portion of Grays Harbor.

Table 3.2-5. Sensitive Receptors within 0.5 Mile of the Grays Harbor Shoreline[a]

Name	City
Child/Day Preschool Care	
Rosie Day Care	Westport
Schools	
Ocosta Elementary	Westport
Ocosta Junior/Senior High	Westport
Grays Harbor College	Aberdeen
Grays Harbor College	Aberdeen
Senior Centers/Skilled Nursing	
Westport South Beach Senior Center	Westport
Parks	
Westhaven State Park	Westport
Westport City Park	Westport
Bottle Beach State Park	Aberdeen
Spinnaker Park	Ocean Shores
Ocean City Beach Access Area	Ocean City
Washington Parks: Ocean City Beach Access Area	Ocean City

[a] The sensitive receptors were identified using internet data sources and were not field-verified.

3.2.4.4 Current Greenhouse Gas Emissions

GHG emissions trap heat in the atmosphere and increase surface temperatures on the Earth. Although some emissions occur through natural processes, emissions from human activities have increased substantially over the last 150 years. The impacts of climate change, such as sea level rise, changes in precipitation patterns, ocean acidification, and surface temperatures are experienced locally and result from global increase in GHG concentration in the atmosphere. Climate change is addressed further in Chapter 6, *Cumulative Impacts.* GHG emissions calculations are characterized in

terms of carbon dioxide equivalent (CO_2e)[11] emissions based on the global warming potential factors consistent with the Intergovernmental Panel on Climate Change Fifth Assessment Report (2013) for carbon dioxide (CO_2), methane, and nitrous oxide.[12]

World Resources Institute maintains an online database of global GHG emissions that is based on a consistent method to estimate emissions for the key GHGs. It is based on inventory data provided by EPA, Department of Energy, Food, and Agriculture Organization of the United Nations, and the International Energy Agency. In 2011, global emissions were estimated to be 43,372.71 million metric tons of CO_2e and U.S. emissions were 6,550.10 million metric tons of CO_2e, (World Resources Institute 2014). In 2011, Ecology reported that Washington State was responsible for contributing 91.7 million metric tons of CO_2e, a decrease from the peak of 101.6 million metric tons in 2007 (Washington State Department of Ecology 2014a).

3.2.5 What are the potential impacts on air quality?

This section describes impacts on air quality that could occur in the study area. Potential impacts of the no-action alternative are described first, followed by potential impacts of the proposed action, including impacts on sensitive receptors.

3.2.5.1 No-Action Alternative

Under the no-action alternative, the applicant would continue to operate its existing facility as described in Section 2.1.2.2, *Existing Operations*. Continued operation of the existing facility consistent with the terms of its current air quality permit and in compliance with Ecology's toxic air pollutant program is not anticipated to result in the exceedance of applicable air quality standards. Although the proposed action would not occur, it is assumed that growth in the region would continue under the no-action alternative, which could lead to development of another industrial use at the project site within the 20-year analysis period (2017 to 2037). Such development could result in impacts similar to those described for the proposed action.

3.2.5.2 Proposed Action

This section describes the impacts that could occur in the study area as a result of construction and routine operation of the proposed action. First, this section describes impacts from construction of the proposed action. It then describes impacts of routine operation at the project site and of routine rail and vessel transport to and from the project site.

Construction

As noted in Chapter 2, *Proposed Action and Alternatives*, construction would likely occur in two phases and would include the use of various types of construction equipment, such as heavy-duty

[11] Carbon dioxide equivalent (CO_2e) is a metric used to compare the emissions of the different greenhouse gases based on their global warming potential. It represents the amount of carbon dioxide emission that would cause the same integrated radiative forcing, over a given time horizon, as an emitted amount of a greenhouse gas or a mixture of greenhouse gases. The equivalent carbon dioxide emission is obtained by multiplying the emission of a greenhouse gas by its global warming potential for the given time horizon (Intergovernmental Panel on Climate Change 2013).

[12] The U.S. GHG Emissions Inventory covers six GHGs; however, since this proposed action does not include refrigeration hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride were not included in the estimate of GHG emissions.

trucks, welders, excavators, and backhoes. Use of this equipment would result in emissions of criteria air pollutants, toxic air pollutants, and GHGs as discussed below.

Criteria Air Pollutants

The study area is in attainment for all criteria pollutants and therefore not subject to federal air quality regulations.[13] However, federal regulations provide emission *de minimis* levels[14] that can be used for evaluating emissions from the construction of the proposed action.

The estimated annual average construction-related emissions for Phase 1 and Phase 2 are well below the *de minimis* levels established by EPA, as provided in Appendix D, *Air Data*. Although emissions of criteria pollutants would occur, they would not be expected to cause a significant contamination of the air and are unlikely to affect sensitive receptors surrounding the project site.

Toxic Air Pollutants

Construction of the proposed action could result in emissions of toxic air pollutants, primarily associated with diesel particulate matter (DPM).

DPM[15] is a known human carcinogen and is linked to numerous health effects including:

- Lung inflammation
- Inflammation and irritation of the respiratory tract
- Eye, nose, and throat irritation along with coughing, labored breathing, chest tightness, and wheezing
- Decreased lung function
- Worsening of allergic reactions to inhaled allergens
- Asthma attacks and worsening of asthma symptoms
- Heart attack and stroke in people with existing heart disease
- Lung cancer and other forms of cancer
- Increased likelihood of respiratory infections
- Male infertility
- Birth defects
- Impaired lung growth in children

The construction-related emissions would be short-term and intermittent, with total DPM of less than 0.17 ton per year, which would be less than 0.2% of total 2011 DPM emissions for Grays Harbor County (9.5 tons per year) (Washington State Department of Ecology 2014a). Acute exposure may irritate the eyes, nose, throat, and lungs. All DPM emissions are associated with mobile sources and because of their relatively low release height, construction personnel could be

[13] General Conformity rules (40 CFR 93) only apply to areas considered in nonattainment or maintenance of federal and state ambient air quality standards.
[14] *De minimis* levels are emission levels below which no significant contamination of the air will occur.
[15] The PM10 emissions from any diesel-fueled equipment are considered. Here the vast majority of construction equipment was considered as diesel fueled.

subject to the highest exposures from construction of the proposed action. Off-site exposure at air quality sensitive receptors would likely be well below any level of concern as these emissions are 30% lower than 2017 DPM emissions from operations.

Greenhouse Gas Emissions

Appendix D, *Air Data*, shows that GHGs emissions would occur under Phase 1 and Phase 2 of construction Phase 1 at 2,228 metric tons per year CO_2e and Phase 2 at 727 metric tons per year CO_2e).

Operations

This section describes impacts that would occur as a result of routine operations at the project site, rail transport along the PS&P rail line, and vessel transport through Grays Harbor.

Criteria Air Pollutants

Onsite

Onsite emissions include those from stationary sources (e.g., emissions from storage tank cleaning, combustion of vapors from vessel loading) and from mobile sources (e.g., emissions from rail locomotives and vessel engines that would occur onsite). Appendix D, *Air Data*, provides the estimated annual average emissions of criteria air pollutants from operations of the proposed action at maximum throughput. Table 3.2-6 provides a summary of estimated annual average emissions of criteria air pollutants emitted onsite; detailed emissions data are provided in Appendix D, *Air Data*.

Table 3.2-6. Estimated Onsite Emissions of Criteria Air Pollutants—Proposed Action (pounds per year)

Pollutant	Stationary Sources	Stationary and Mobile Sources
NOX	30,915	63,904
PM10	917	1,648
PM2.5	917	1,603
VOC	123,379	124,765
CO	168,033	171,141
SO2	8,472	9,220

Source: Appendix D, *Air Data*
NO_X = nitrogen oxides; PM10 = particulate matter with a diameter of 10 micrometers or less; PM2.5 = particulate matter with a diameter of 2.5 micrometers or less; VOC = volatile organic compound; CO = carbon monoxide; SO_2 = sulfur dioxide

Based on air quality dispersion modeling performed for onsite stationary sources as part of the applicant's air permit application process (Trinity Consultants 2015), the most potentially problematic air pollutant is nitrogen oxides (NO_X). Modeling determined that the 1-hour nitrogen dioxide concentration could reach 78% of the national ambient air quality standards (NAAQS) (with background included). This estimate was conservatively reached by adding the simultaneous occurrence of emissions associated with bringing rail cars on site and vessel operation during loading. Further, it was assumed that 80% of the NO_X was emitted as nitrogen dioxide concentrations and that the highest NO_X emissions from the rail and vessel operations would be received at the same location as the highest NO_X emissions modeled for the stationary sources. Even

under these conservative assumptions, the 1-hour nitrogen dioxide concentrations on site would not exceed the NAAQS.

Average annual emissions of criteria air pollutants from onsite operations of stationary sources under the proposed action at maximum throughput were also compared to total 2011 emissions in Grays Harbor County (Appendix D, *Air Data*). The following are stationary sources.

- Fugitive emissions (emissions from losses during filling and draining)
- Storage tanks (leaks from valves and flanges)
- Tank cleaning
- Marine vapor combustion unit (vessel loading emissions)

For each of the criteria air pollutants, the onsite stationary emissions would range from less than 1 to 53% of the county total emissions for each pollutant. The maximum incremental increase is for volatile organic compound emissions.

Rail

Operation of the proposed action at maximum throughput would add approximately two unit train trips[16] per day on average (730 per year maximum) along the PS&P rail line. The average is three train trips per day (1,235 per year) under the no-action alternative (Section 3.15, *Rail Traffic*). This increase in rail traffic would result in increased emissions of all criteria air pollutants with the exception of particulate emissions. The most notable increase is predicted for NO_X. Table 3.2-7 summarizes the annual operational emissions of criteria pollutants emitted within Grays Harbor County under the proposed action compared to Grays Harbor County emissions. Total additional annual NO_X emissions from rail within Gray Harbor County are predicted to be 38.4 tons per year, followed by carbon monoxide emissions at 5.7 tons per year, with all other predicted emissions less than 2.5 tons per year.

[16] A trip represents one-way travel; in other words, an inbound trip and an outbound trip are counted as two trips.

Table 3.2-7. Annual Operational Emissions of Criteria Air Pollutants Emitted in Gray Harbor County —Proposed Action Compared to 2011 Gray Harbor County Emissions (tons/year)

Criteria Air Pollutant	Sources	Source Categories[a]					Total Emissions
		Facility Operations[b]	Rail[c, d]	Vessel[d]	On-Road Mobile	Other Sources	
NO_X	Proposed action	16	38.4	78.5	0.1	-	**132.5**
	Grays Harbor County	644	41	298	2,224	484	**3,692**
PM10	Proposed action	1.60	1.4	1.2	<0.01	-	**4.2**
	Grays Harbor County	410	1	10	83	1,681	**2,185**
PM2.5	Proposed action	1.60	0.9	1.1	0.00	-	**3.64**
	Grays Harbor County	375	1	9	66	723	**1,174**
VOC	Proposed action	75.3	2.5	3.5	0.01	-	**81.3**
	Grays Harbor County	141	2	8	1,139	19,451	**20,740**
CO	Proposed action	84	5.7	5.5	0.2	-	**95**
	Grays Harbor County	731	4.1	56	13,786	12,563	**27,140**
SO_X	Proposed action	8.67	0.0	1.90	<0.01	-	**10.57**
	Grays Harbor County	227.70	0.29	14.65	7.07	21.46	**271.2**

Sources: Grays Harbor County emissions: Washington State Department of Ecology 2014a; proposed action facility operations emissions: Trinity Consultants 2015

[a] Source categories based on Washington State Department of Ecology 2014a.

[b] The proposed action onsite emissions include emissions from onsite rail and vessel operations. The county emissions represent those from all other industrial point sources.

[c] Based on estimate that 68% of the fuel consumption from rail transit along the PS&P occurs within Grays Harbor County.

[d] Rail and vessel emissions for the proposed action include emissions from on-site rail and vessel operations.

CO = carbon monoxide; NO_X = nitrogen oxides; SO_X = sulfur oxides; VOC = volatile organic compound; PM10 = particulate matter with a diameter of 10 micrometers or less; PM2.5 = particulate matter with a diameter of 2.5 micrometers or less

In general, emissions of criteria pollutants related to increased rail traffic would approximately double the existing levels for the county's inventory associated with rail activity. However, rail emissions are mobile and would be spread out along the 59-mile PS&P rail line, making it unlikely that a localized concentration of emissions would occur that could exceed the 1-hour standard with the exception of NO_X.

As noted previously, the predicted NO_X rail emissions associated with the proposed action would represent the highest level of emissions and are substantially greater than the other criteria pollutants. The initial screening modeling shows that the 1-hour nitrogen dioxide standard could be exceeded. For these reasons, NO_X emissions are considered the primary criteria air pollutant of concern. In other words, it is the criteria air pollutant most likely to exceed the NAAQS. However, because no violation of the nitrogen dioxide NAAQS is anticipated at the project site based on the air quality modeling, emissions from locomotives during transit are not expected to violate air quality standards. This is because rail emissions would be emitted across the entire 59-mile PS&P rail line, making it unlikely that a localized concentration of emissions would exceed the 1-hour standard. Additionally, total NO_X emissions attributed to the proposed action, including increased vessel traffic emissions, would represent less than 4% of the county's total NO_X inventory.

Vessel

Operation of the proposed action at maximum throughput would result in an average of approximately one tank vessel trip[17] per day (a maximum of 400[18] per year) along the navigation channel compared to the 436 large commercial vessel[19] trips under the no-action alternative (Section 3.17, *Vessel Traffic*).

NO_X emissions from vessel operations would be 78.5 tons per year, followed by carbon monoxide emissions at 5.5 tons per year (Table 3.2-7). All other predicted emissions would be less than 3.5 tons per year (Table 3.2-7). In general, emissions of criteria air pollutants related to increased vessel traffic would increase the existing levels of the county's vessel-related emissions from 10 to 45%.

Because predicted vessel NO_X emissions would be approximately 15 to 70 times greater than the other criteria air pollutants, and because initial air quality screening modeling shows a possible exceedance of the 1-hour nitrogen dioxide standard, NO_X emissions are considered the primary criteria air pollutant of concern. In other words, it is the criteria air pollutant most likely to exceed the NAAQS. However, because no violation of the NAAQS is anticipated at the project site based on air quality modeling, even under the conservative conditions described above, it is not anticipated that emissions from vessels during transit would violate air quality standards. This is because vessel emissions would be emitted away from shore and would spread out over the navigation channel, such that a localized concentration of emissions would not likely exceed the 1-hour standard. Additionally, total NO_X emissions attributed to the proposed action, including increased vessel traffic emissions, would represent less than 4% of the county's total NO_X inventory.

Toxic Air Pollutants

Onsite

Onsite operations of the proposed action would also result in emissions of toxic air pollutants (DPM, PM10, benzene, formaldehyde, and toluene) and air toxics (includes all hazardous air pollutants as well as hydrogen sulfide, sulfuric acid mist, n-hexane, cyclohexane, nitrogen dioxide, sulfur dioxide, and carbon monoxide). Potential impacts from onsite sources, with the exception of DPM, were assessed using the methods outlined in the WAC 173-460-020 (Controls for New Sources of Toxic Pollutants).

In Washington State, all new stationary sources emitting toxic air pollutants are required to show compliance with the Washington toxic air pollutant program pursuant to WAC 173-460. Ecology has established a small quantity emission rate small quantity emission rate and an acceptable source impact level for each listed toxic air pollutant. If the toxic air pollutant emissions rate from a source is above its respective small quantity emission rate, further determination of compliance with the ASIL is required.

All of the toxic air pollutants emitted from onsite operations would be either under their respective small quantity emission rates or in compliance with their respective ASILs. The highest toxic air pollutant emissions as a percentage of its respective ASIL (62%) would be for annual benzene concentration at 0.0214 $\mu g/m^3$.

[17] A trip represents one-way travel.
[18] Proposed vessel trips are total for the facility so are not in addition to trips attributable to the applicant under the no-action alternative (approximately 14 per year).
[19] The term *large commercial vessel* refers collectively to tank and cargo vessels.

The impacts of DPM emissions from rail car unloading at the project site are described below.

Rail

The dominant air toxic emissions (both a hazardous and toxic air pollutant) from rail transport are DPM emissions from the burning of diesel fuel. Air dispersion modeling of DPM was conducted using EPA's AERMOD[20] dispersion model for the proposed action's rail activities between Poynor Yard and the project site. This area would have the highest emissions along the PS&P rail line from rail switching and unloading activities, as described in Section 3.15, *Rail Traffic*. Rail switching and unloading activities were modeled using 5 years (2007 to 2011) of Hoquiam area meteorological data, and a 5-year average annual DPM cancer risk was determined. Total emissions of DPM were estimated at 0.13 ton per year.

Figures 3.2-1 and 3.2-2 show the average increased inhalation cancer risk from DPM for the proposed action in 2017 and 2037[21] by illustrating the 100 per million and 10 per million risk levels. The air quality sensitive receptors within these risk levels are also shown.

Under WAC 173-460 (Controls of New Sources of Toxic Air Pollutants), Ecology may recommend approval for a stationary source project that is likely to cause an exceedance of acceptable source impact levels for one or more toxic air pollutants if it is demonstrated that the increase in emissions of toxic air pollutants (such as DPM) would not likely result in an increased cancer risk of more than 10 in 1 million. However, this regulation only applies to stationary sources, not mobile sources such as rail locomotives. There are no local or state regulations for DPM emissions from mobile sources. For this reason, the 10-per-million risk level is not a threshold to determine significance of the impact. However, to provide context of the average increased inhalation cancer risk from DPM, the 10-per-million risk level is shown in Figures 3.2-1 and 3.2-2. EPA would typically urge action to mitigate the increased risk of exposure at the 100-per-million risk level if a sensitive receptor was within this risk level. The 100-per-million risk level is also shown in Figures 3.2-1 and 3.2-2.

The analysis indicates that the 100-per-million and above risk level from rail operations would be limited to the project site in 2017 and 2037. The 10-per-million risk level would extend approximately 0.2 mile from the project site in 2017 and approximately 0.15 mile from the project site in 2037. The 28th Street Landing and Viewing Tower, sensitive receptors, would be within the 10-per-million risk level in 2017 and 2037. No other sensitive receptors would be within the 10-per-million risk level. Implementation of the mitigation in Section 3.2.7.2, *Applicant Mitigation*, would reduce the risks of exposure of sensitive receptors.

DPM emissions from rail transport along the entire PS&P rail line in the initial year of full operation (2017) are estimated at 3,738 pounds per year. Based on the length of the PS&P rail line (59 miles between Centralia and project site), this represents approximately 78 grams of DPM per day per mile.

Washington State Department of Transportation prepares yearly summaries of annual average daily traffic volume and percentage of heavy-duty truck traffic on state and federal highways. According to the most recent summary of 2013 traffic data, traffic along US Highway 12 (US 12) (approximately 12.3 miles east of its junction with US Highway 101 [US 101]) had an average heavy-

[20] AERMOD is a dispersion model recommended by EPA for estimating the impact of industrial sources of emissions on ambient air quality.

[21] Years 2017 and 2037 were modeled to assess the risk from DPM emissions over time because locomotives that emit less DPM than in 2017 will be in operation by 2037.

duty daily truck activity level of 1,900 vehicles (Washington State Department of Transportation 2013). These types of trucks are almost entirely diesel fueled. Assuming these are all diesel fueled and using the fleet average DPM emission factor from the EPA MOVES 2010 model for heavy-duty trucks results in an average daily DPM emission rate of 760 grams per mile. Based on a comparison of the predicted fuel usage of trains related to the proposed action, the increase in DPM associated with rail transport along the PS&P rail line under the proposed action would be the equivalent of a 5.6% increase in heavy-duty truck traffic or about the equivalent of 107 heavy-duty trucks per day. This increase in emissions from rail transport between Aberdeen and Centralia is not expected to result in a significant increase in DPM exposure for any sensitive receptors along the PS&P rail line or to the public.

Figure 3.2-1. Average Diesel Particulate Matter Inhalation Risk (2017)

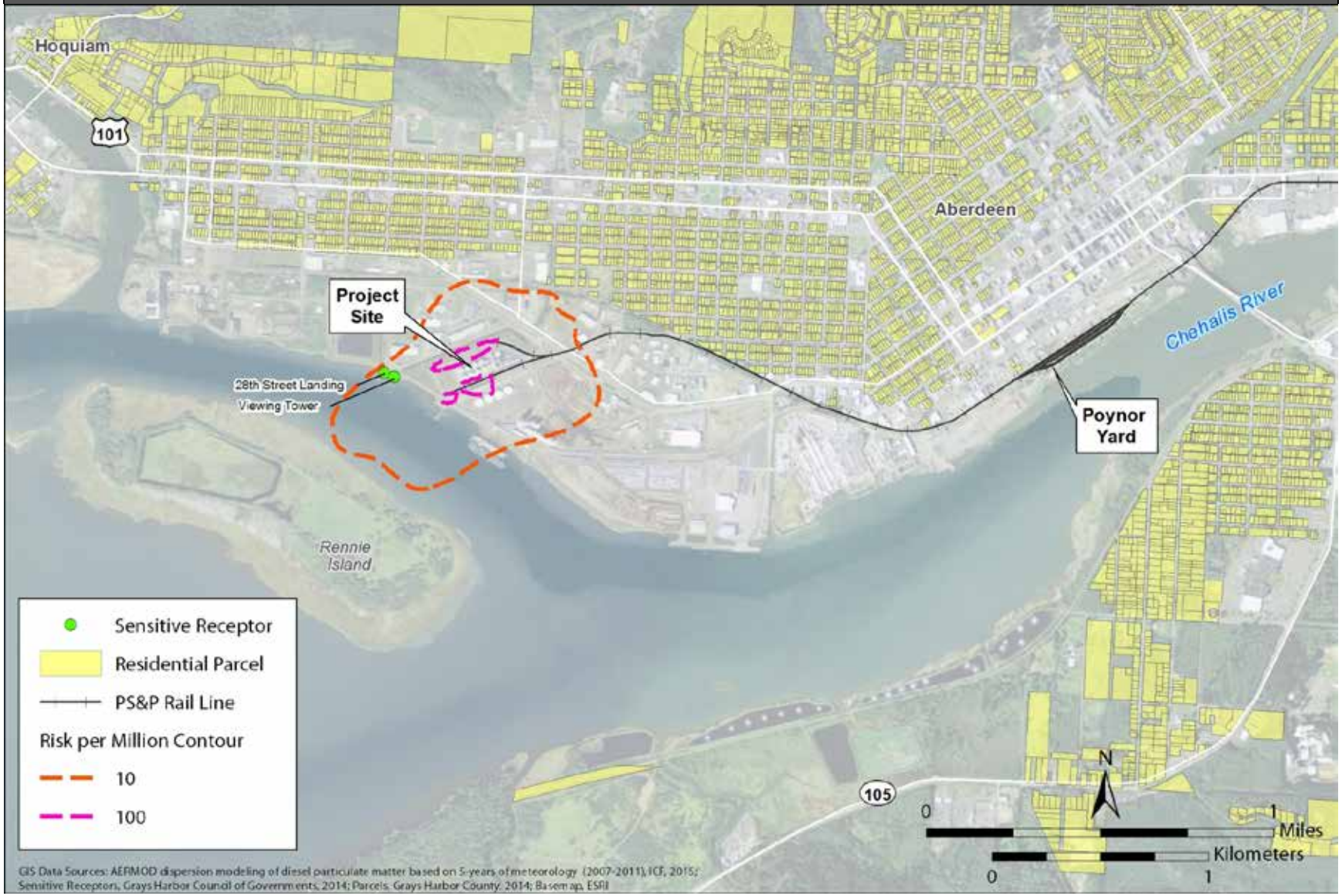
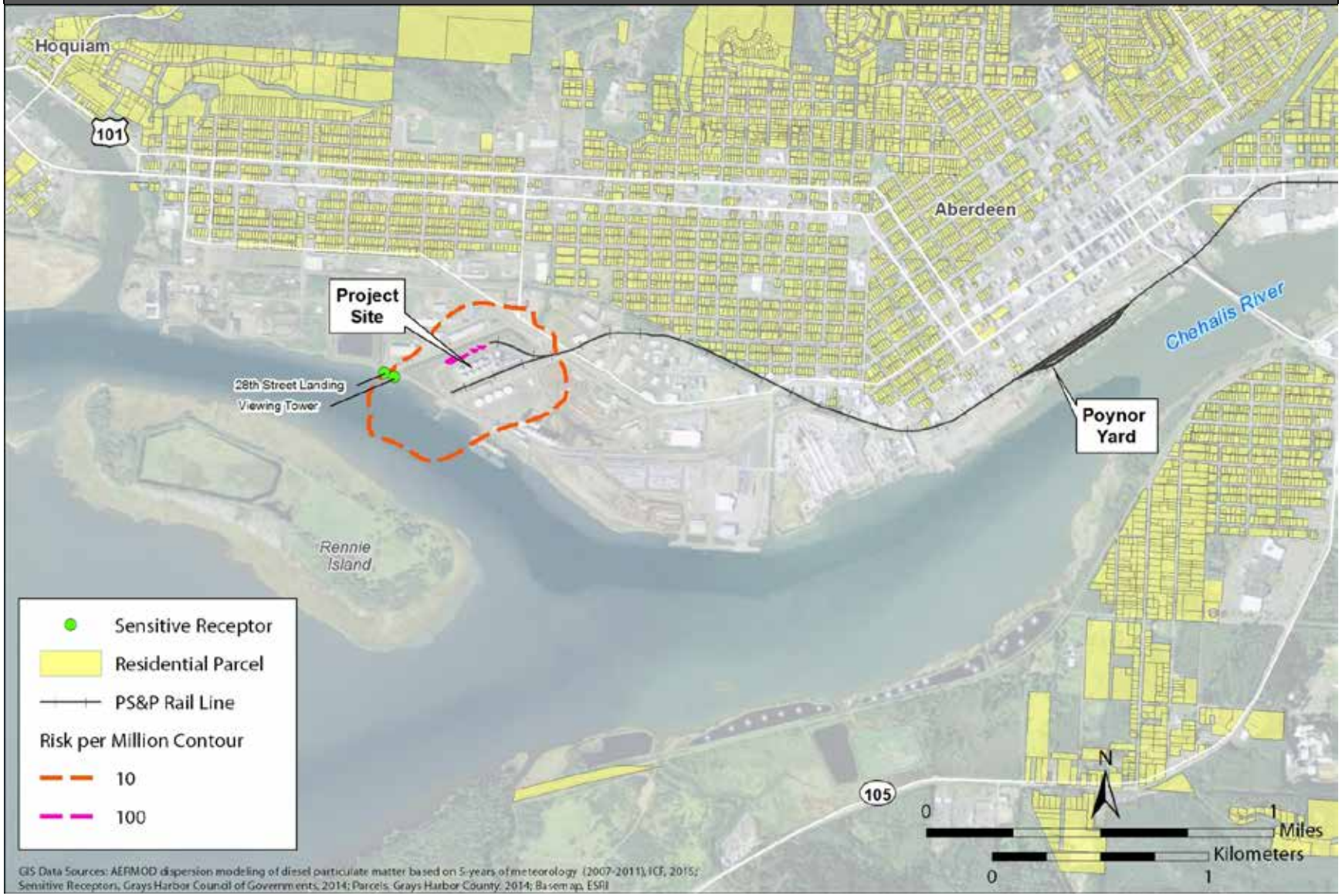


Figure 3.2-2. Average Diesel Particulate Matter Inhalation Risk (2037)



Vessel

Under the proposed action, tank vessels calling at Terminal 1 would include tank barges and tankers. These tank vessels typically burn marine distillate fuel oil, which is a slightly heavier fuel oil than diesel but shares most of the same chemical properties and composition. Assuming the same cancer risk for marine distillate fuel oil as diesel fuel oil to approximate the air toxic health risk from vessel transport in the study area, the dominant air toxic emission (both a hazardous and toxic air pollutant) would be DPM.

In a recent study examining the impact of these emissions during vessel transit, nearshore cancer risks of about 100 in 1 million were determined within a distance of 1.1 miles of the shipping corridor (California Air Resources Board 2008: Figure D-25). This result was based on 1,916 vessels calling per year, with most ships weighing between 40,000 and 80,000 dead weight tons and traveling at a speed of 13.5 knots. Under the proposed action, up to 200 vessels per year, mostly the smaller tank barges (20,000 dead weight tons) assisted by pilot boats and a tug, would call at Terminal 1. The emissions from the pilot boat and assist tug are about 30% of the emissions of the tank barges. Conservatively, assuming that the emissions from the tank barges are roughly equivalent to the larger vessels in the California Air Resources Board study, the estimated projected transit activity would be equivalent to 260 tank barges. Thus, the estimated increase in nearshore risk across the inlet to Grays Harbor would be less than 13 in a million, likely less given the wider inlet and smaller vessels and engines. This increase in risk is just at the Ecology acceptable threshold increase in cancer risk. However, given the wider inlet and engine on the tank barges this should not affect any sensitive receptors along the shoreline.

Greenhouse Gas Emissions

Operation of the proposed action at maximum throughput would result in the emission approximately 43,759 metric tons of CO2e each year (Table 3.2-8). The largest contribution of operational GHG emissions under the proposed action would result from rail transport within Washington State and would represent an approximately 3.6% increase in the statewide rail emissions of GHGs. However, over the 20-year analysis period, improvements in the efficiency of locomotives may decrease the total GHG emissions resulting from the proposed action.

Onsite emissions—those from operation of the marine vapor combustion unit, on-site rail switching operations, and vessels at the dock during loading—would account for approximately 9,322 metric tons of CO_2e each year (Table 3.2-8).

Appendix D, *Air Data*, provides a more detailed comparison of average annual statewide GHG emissions and emission from proposed operations.

Table 3.2-8. Annual Average GHG Emissions from Operations—Proposed Action (metric tons of CO_2e per year)

Source Type	Proposed Action
Rail transit	33,282[a]
Rail switching (on-site)	2,426
Vessel transit	1,155
Vessels at dock during loading (on-site)	262
Industrial sources (project site)	6,634[b]
Total	**43,759**

[a] Includes emissions from rail transport throughout the state.
[b] Trinity Consultants 2015

Total estimated annual GHG emissions related to operation of the proposed action at maximum throughput represent an increase of approximately 0.047% in statewide annual GHG emissions. RCW 70.235.020 sets the following GHG statutory reduction levels for GHG emissions.

- By 2020, reductions to 1990 emission levels.
- By 2035, reductions to 25% below 1990 levels.
- By 2050, reductions to 50% below 1990 levels or 70% below Washington State's expected emissions that year.

In order to meet these reductions, Washington State must reduce emissions to 88.4 million metric tons of CO_2e per year by 2020, 66.3 million metric tons of CO_2e by 2035, and approximately 44.2 million metric tons of CO_2e by 2050.[22] The GHG emissions from the proposed action would be approximately 0.10% of Washington State's statutory reductions of 44.2 million metric tons of CO_2e per year (half of the 1990 level) by 2050.

In November 2014, the United States entered into a nonbinding agreement with China to reduce emissions to 26 to 28% below 2005 levels (White House 2014). This national goal translates to annual emissions between 4,628 and 4, 756 million metric tons of CO_2e by 2025. The GHG emissions from the proposed action would represent approximately 0.00093% of these national targets.

According to the International Panel on Climate Change (IPCC), cumulative GHG emissions should be limited to 1 trillion metric tons (total) by 2050 or the planet will exceed the 2°C warming threshold. Currently, the amount of GHGs that have been emitted worldwide since the Industrial Age is estimated to be 592 billion metric tons (Oxford E-Research Center 2015). Cumulative world emissions should be limited to 408 billion metric tons to meet the 2050 target. Of the 408 billion metric tons remaining, the emissions from the proposed action would constitute 0.000011% of the total.

In addition to GHG emissions caused by onsite operations and offsite rail and vessel transport, the combustion of the proposed bulk liquids would also result in GHG emissions. While it is possible to estimate the total emissions from end use the proposed bulk liquids, it is much more complex and complicated to determine whether those GHG emissions would be additive or if they would otherwise replace existing GHG emissions.

[22] Total emissions needed to reach the Washington State statutory reductions were calculated based on the required reduction from the most recently available statewide inventory of 91.7 million metric tons of CO_2e in 2011 (Washington State Department of Ecology 2014a).

Using EPA's average heat content of crude oil of 5.80 million British thermal units (mmBtu) per barrel (U.S. Environmental Protection Agency 2014) and the more conservative emissions factor for diluted bitumen listed in Table 3.2-9, the maximum amount of CO_2 emissions from end use of products shipped through the proposed facility in a given year is 13,067,400 metric tons of CO_2 per year.

Table 3.2-9. Estimated CO_2 Emissions Factors for Oil Combustion

State or Condition	Products	CO_2 Emissions Factors (kg CO_2 per mmBtu)
Petroleum Fuels		
Refined	Gasoline	70.22
	Kerosene	75.20
	Naptha	68.02
	Jet fuels	72.22
	No. 2 fuel oil (diesel oil)	73.96
	No.6 fuel oil (bunker c oil)	75.10
	Vacuum gas oil	73.00 (Estimate)
Unrefined	Bakken crude oil	73.96
	Diluted bitumen	75.10
Non-Petroleum Fuels		
Pure (unblended)	Ethanol	68.44
Can be composed of 20–80% of plant-based fuel	Renewable jet fuel	72.22 (Estimate)
Can be composed of 20–80% of plant-based fuel	Renewable diesel	73.84
Variable composition	Used cooking oil/animal fat	71.06

Source: U.S. Environmental Protection Agency 2014
kg CO_2 per mmBtu = kilograms of carbon dioxide per million British thermal unit

Determination of the incremental increases in GHG emissions relative to the no-action alternative is complex and depends on numerous relatively unpredictable factors. The relative contribution of the proposed action to the net change in CO_2 emissions would depend on whether the proposed action results in increased demand for crude oil or displaces other crude oil consumed by end users (which depends, in part, on the source and final destination for the oil), what type of crude oil is being transported (i.e., which emissions factors are used), and what the end use is (e.g., combustion versus development of other products).

The results presented above are conservative because of three assumptions in the analysis.

- The entire amount of crude oil to be handled at the project site would be additive; it would not replace other sources of crude oil.
- The oil would be diluted bitumen.
- The end use would be combustion.

However, as noted in Chapter 2, *Proposed Action and Alternatives*, it anticipated that the crude oil to be handled and stored at the proposed facility would come from domestic sources (e.g., Bakken crude oil) and would likely be transported to the Puget Sound. Bakken oil has a lower emissions factor than diluted bitumen and based on current market conditions, Bakken oil would most likely

replace existing sources of crude oil. This means that GHG emissions from end use combustion represent the maximum incremental increase in GHG emissions and that, depending on the specific market conditions and properties of the oil, emissions could be incrementally lower.

In addition, there is reason to believe that much of the crude oil being transported to the new facility would replace crude oil that was previously transported by tank ship. The Washington 2014 Marine & Rail Oil Transportation Study stated the following (Washington State Department of Ecology 2014b).

> …historically, 90% of crude oil bound for Washington's refineries was delivered here by tank ship from Alaska or from other international sources of oil. Today pipeline and rail delivery of crude oil make up more than 30% of our imports, while vessel delivery is reduced to less than 70%. Crude oil transportation is rapidly shifting to delivery by rail and pipeline.

The majority of the crude oil handled at the facility is expected to be Bakken crude oil, which, because it can only be transported to U.S. refineries, would replace oil currently used in U.S. refineries. Because U.S. refinery capacities are limited by law, existing refineries would not increase their capacity and emissions to accommodate new shipments and thus would not increase CO_2 emissions.

Also, crude oil may be refined into multiple other products that may or may not have substantial GHG emissions (e.g., asphalt is not combusted and is a crude oil product) and the end use would vary based on the product and market. If diluted bitumen is handled, for example, it could go to either U.S. refineries or non-U.S. refineries. Because this crude oil can be broken down into a variety of products and their end use varies, the end-use combustion calculation, which assumes that all of the oil will be combusted, is conservative and likely overstates total GHG emissions. Even if the proposed facility is not built, additional GHG emissions from end use may still occur over the course of the analysis period. This is because the product could be transported to another facility for use or exported depending on the source of the oil, the type of oil, and the final point of delivery.

Regardless of the end-use emissions scenario, the proposed action would represent a very small segment of the crude oil market in the United States. The U.S. Energy Information Administration provides data for U.S. petroleum flows (U.S. Energy Administration 2013, 2015). In 2013, 7.45 million barrels of crude oil were produced in the United States, and 7.72 million barrels of crude oil were imported every day. Together, this equals 15.17 million barrels of crude oil supplied to the United States every day. Based on maximum throughput, operation of the proposed action would transport approximately 82,192 barrels per day on average or 0.0054% of the U.S. daily crude oil supply.

For more information on GHG emissions and climate change, see Chapter 6, *Cumulative Impacts*.

3.2.6 What required permits and plans apply to air quality?

The proposed action is subject to compliance with an air permit issued by the Olympic Region Clean Air Agency, which would include enforceable requirements specifying emission limits, reporting, and record-keeping requirements for onsite stationary sources. Air emissions would be controlled using best available control technology as required by the agency as part of the proposed action's Notice of Construction Air Permit. The following permit conditions are expected to reduce impacts on air quality.

- To reduce the potential for fugitive emissions associated with rail transport during site operations, the applicant will ensure via contract that rail cars are equipped with vacuum breakers designed to prevent escape of vapors from headspace of rail cars during unloading operations.
- To reduce the potential for tank emissions, the applicant will design tanks to reduce tank emissions using the following method.
- To reduce the potential for tank emissions, the applicant will design tanks to reduce tank emissions using the following equipment.
  - Storage tanks with floating roof in combination with cable suspended full contact internal floating deck with near-zero vapor space.
  - Internal floating roof mechanical shoe primary seal and a rim-mounted secondary seal.
- To reduce the potential for site operations emissions, the applicant will undertake the following actions.
  - For bulk liquids with vapor pressures equal to or greater than 0.5 pounds per square inch absolute under actual storage conditions, control displaced vapors during loading of marine vessels and barges with a marine vapor combustion unit having a minimum of 98% destruction efficiency.
  - Use submerged loading of marine vessel and barge storage tanks.
  - Collect marine vessel and barge vent vapor fugitive emissions via vapor-tight pipelines.
  - Implement leak detection and repair plan for transfer equipment in liquid and vapor service.
  - Operate and maintain all equipment including marine vapor combustion unit according to operations and maintenance plan.

3.2.7 What mitigation measures would reduce impacts on air quality?

This section describes the applicant mitigation measures that would reduce impacts on air quality from construction and routine operation of the proposed action.

3.2.7.1 Applicant Mitigation

The applicant will implement the following mitigation.

- The applicant will ensure that all engine-powered equipment and vehicles used in construction, operation, and maintenance at the facility are subject to a regular inspection and maintenance schedule in order to minimize air pollutant emissions, GHG emissions, and fuel consumption. Preventive maintenance activities will include but not be limited to the following actions.
  - Replacing oil and oil filters as recommended by manufacturer instructions.
  - Maintaining proper tire pressure in on-road vehicles.
  - Replacing of worn or end-of-life parts.
  - Scheduling routine equipment service checks.

- The applicant will develop and implement an anti-idling policy for both construction and operation and ensure that equipment operators receive training on best practices for reducing fuel consumption in order to reduce project-related GHG emissions. The anti-idling policy will include required warmup periods for equipment and prohibit idling beyond these periods. The policy will define any exemptions where idling is permitted for safety or operational reasons, such as when ambient temperatures are below levels required for reliable operation. In addition, the use of technologies such as idle management systems or automatic shutdown features will be considered part of the policy.
- To monitor diesel particulate matter (DPM) emissions associated with rail operations at and near the project site, the applicant will install a DPM monitoring station prior to beginning operations. The applicant will submit the DPM emission report to the City of Hoquiam annually. The City of Hoquiam will coordinate with the City of Aberdeen, Ecology, and ORCAA as applicable, to review the emission report. If DPM emissions are observed to approach levels of concern for sensitive receptors, then the City of Hoquiam will require the applicant to modify operations to reduce DPM emissions. These actions could include:
  - Modifying or reducing switching operations between Poynor Yard and the project site to reduce DPM emissions during switching operations.
  - Installing a commercial idle control retrofit device on switching locomotives to reduce DPM emissions from idling.
  - Using Tier 3 or Tier 4 compliant[23] switching engines at Poynor Yard.
- To reduce GHG emissions, DPM, and other air pollutants from the locomotives, idling will be minimized to the maximum extent practicable. Shutting down locomotive engines as soon as practicable when not in use and delaying restart until necessary for car switching or departure from the facility would reduce these pollutants.
- To minimize idling from trains and vessels and resulting emissions, the Applicant will coordinate with the Port of Grays Harbor and PS&P to manage waiting times for rail and vessel arrivals or departures.

3.2.8 Would the proposed action have unavoidable and significant adverse impacts on air quality?

Compliance with the applicable regulations along with implementation of the mitigation measures described above would reduce impacts on air quality. There would be no unavoidable and significant adverse impacts.

[23] These refer to standards for implementing the EPA's program to improve locomotive efficiency to reduce emission of particulate matter and nitrous oxides.

3.3 Water

Water resources in Washington State include surface waters, groundwater, floodplains, and wetlands. Surface waters such as rivers, wetlands, lakes, and coastal waterways provide natural beauty and sustain the health of human and natural communities. Groundwater, often stored in aquifers formed of permeable rock or loose material, provides water for human and environmental well-being. The quality of surface waters and groundwater refers to the physical, chemical, biological, and aesthetic characteristics of water, which are used to measure the ability of water to support aquatic life and human uses. Groundwater and surface-water quality can be eroded by contaminants introduced by domestic, industrial, and agricultural practices.

Wetlands form a regularly saturated transition between surface waters and uplands. These wet soils support a diversity of plants that are adapted to these conditions. Floodplains are also lowland areas adjacent to lakes, wetlands, and rivers, but they are periodically covered by water during a flood. Floodplains carry and store floodwaters, thus protecting human life and property from flood damage. Undeveloped floodplains provide many other natural and economic resource benefits. Floodplains often contain wetlands and other areas vital to a diverse and healthy ecosystem. Undisturbed, they have high natural biological diversity and productivity, and support many waterfowl species and migrating birds.

This section describes water in the study area, including hydrology and water quality related to surface waters, wetlands, floodplains, and groundwater. It then describes impacts on water that could result under the no-action alternative or as a result of the construction and routine operation[1] of the proposed action. Finally, this section presents any measures identified to mitigate impacts of the proposed action and any remaining unavoidable and significant adverse impacts.

3.3.1 What is the study area for water?

The study area for water consists of water resources on and near the project site that could be affected by construction and routine operation at the project site. The study area also includes water that could be affected during routine rail transport along the Puget Sound & Pacific (PS&P)[2] rail line and vessel transport through Grays Harbor out to 3 nautical miles from the mouth of the harbor.

3.3.2 What laws and regulations apply to water?

Laws and regulations for determining potential impacts on water are summarized in Table 3.3-1. More information about these laws and regulations is provided in Appendix B, *Laws and Regulations*.

[1] Chapter 4, *Environmental Health and Safety*, addresses the potential impacts from increased risk of accidents (e.g., storage tank failure, train derailments, vessel collisions) and related consequences (e.g., release of crude oil or other proposed bulk liquids).
[2] The PS&P rail line refers to the rail line between Centralia and the project site.

Table 3.3-1. Laws and Regulations for Water

Laws and Regulations	Description
Federal	
Clean Water Act (33 U.S.C. 1251 et seq.)	Establishes the basic structure for regulating discharges of pollutants into navigable waters of the United States by regulating point pollution sources, such as stormwater discharges, and contains specific provisions related to the accidental release of oil and other hazardous substances into U.S. waters.
Oil Pollution Act of 1990 (33 U.S.C 40 et seq.)	Expands the federal government's ability to prevent and respond to oil spills and preserves state authority to establish laws governing oil spill prevention and response.
National Flood Insurance Act of 1968 (42 U.S.C. 4001 et seq.)	Establishes the NFIP, a federal floodplain management program designed to reduce future flood losses through the implementation of community-enforced building and zoning ordinances.
Nonindigenous Aquatic Nuisance Prevention and Control Act of 1990, as amended by the National Invasive Species Act of 1996 (16 U.S.C. 4711 et seq.)	Establishes regulations enforced by the U.S. Coast Guard regarding the discharge into U.S. waters of aquatic nuisance species from ship ballast water.
State	
Water Pollution Control Act (RCW 90.48)	Regulates the discharge of pollutants into waters of the state with the goal of preventing and restoring the quality and integrity of these resources.
NPDES Permit Program (WAC 173-220)	Establishes a state permit program applicable to the discharge of pollutants and other wastes and materials to the surface waters of the state.
Water Rights—Oil and Hazardous Substance Spill Prevention and Response (RCW 90.56)	Establishes programs to reduce risks and develop a response to oil and hazardous substance spills; provides a process to calculate damages from an oil spill and holds responsible parties liable for damages resulting from injuries to public resources.
Oil Spill Natural Resources Damage Assessment (WAC 173-183)	Establishes procedures for convening a resource damage assessment committee, preassessment screening of damages, and selecting the damage assessment method.
Ballast Water Management Law (RCW 77.120)	Regulates discharge of ballast water into waters of the state for vessels of 300 gross tons or more.

Laws and Regulations	Description
Local	
Critical Areas Ordinance (HMC 11.06 and AMC 14.100)	Sets forth the definitions and process for designating and protecting critical areas within the city limits of Hoquiam and Aberdeen, respectively.
Stormwater Management Regulations (HMC 10.05.120 and AMC 13.70)	HMC 10.05.120 requires all new industrial development to provide for the control and management of stormwater runoff. AMC 13.70 establishes minimum requirements and procedures to control the adverse impacts associated with increased storm and surface water runoff.

U.S.C. = United States Code; NPDES = National Pollutant Discharge Elimination System; NFIP = National Flood Insurance Program; RCW = Revised Code of Washington; WAC = Washington Administrative Code; HMC = Hoquiam Municipal Code; AMC = Aberdeen Municipal Code

3.3.3 How were impacts on water evaluated?

This section describes the sources of information and methods used to evaluate impacts.

3.3.3.1 Information Sources

Information used to complete the impact analysis included the following sources.

- Environmental permitting documents prepared for the proposed action by the applicant, the City of Hoquiam, the City of Aberdeen, and Washington State Department of Ecology (Ecology).
- U.S. Geological Survey National Hydrography Dataset for information on rivers, streams, and drainages.
- Northwest Area Committee's Grays Harbor Geographic Response Plan for information on the Grays Harbor estuary and its hydrologic characteristics.
- U.S. Fish and Wildlife Service National Wetland Inventory maps for information on potential wetlands.
- Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps for Hoquiam, Aberdeen, Ocean Shores, Westport, Cosmopolis, Montesano, Elma, Oakville, Centralia, and unincorporated portions of Grays Harbor, Thurston, and Lewis Counties for information on flood hazard areas and mapped floodplains.
- Ecology's Chehalis Basin Area Water Quality Improvement Project website for information on general water quality issues in the basin.
- Ecology's 2012 U.S. Environmental Protection Agency-approved Water Quality Assessment and Clean Water Act Section 303(d) List for information on water quality-impaired surface waters.
- Ecology's Permit and Reporting Information System for information on existing National Pollutant Discharge Elimination System (NPDES) and state-issued stormwater and industrial discharge permits.
- U.S. Geological Survey scientific investigations reports for information on regional groundwater resources.

Information obtained from these sources was augmented with information collected during a September 10, 2014, site visit and facility tour.

3.3.3.2 Impact Analysis

Potential impacts on water resources were assessed qualitatively. The analysis identifies potentially affected resources located on, adjacent to, and within 1 mile of the project site. Potentially affected resources within 0.5 mile of the PS&P rail line, portions of Grays Harbor farther than 1 mile from the project site, and in the Pacific Ocean up to 3 nautical miles from the harbor entrance are discussed more generally.

Impacts on water resources in the study area were determined by examining the information sources above. Impacts related to construction and onsite operations were determined by determining how construction would affect mapped water resources and how stormwater received at the project site would connect to water resources.

3.3.4 What water resources are in the study area?

This section describes water in the study area that could be affected by construction and routine operation of the proposed action. This section describes the general hydrologic setting of the study area and describes the location, characteristics, and quality of water resources at the project site, along the PS&P rail line, and in and along the shoreline of Grays Harbor. These water resources include surface waters, wetlands, groundwater, and floodplains. This section also provides a brief discussion of the existing stormwater system at the project site and describes how it connects to local waters.

3.3.4.1 General Hydrologic Setting

The study area is located in the Chehalis River watershed, which is composed of two Washington State Watershed Resources Inventory Areas (WRIAs): WRIA 22, lower Chehalis River and WRIA 23, upper Chehalis River. WRIAs are formalized water resource management and planning areas that represent the 62 major watersheds in Washington State. The project site, the portion of the PS&P rail line that goes to the town of Porter, and Grays Harbor are all located in WRIA 22. The remaining portions of the rail line between Porter and Centralia are in WRIA 23.

The Chehalis River is one of the primary drainage features in WRIAs 22 and 23. It terminates in Grays Harbor, which is connected to the Pacific Ocean at its western end. Tributaries to the Chehalis River include the Newaukum River, Skookumchuck River, Black River, Satsop River, Wynoochee River, and Wishkah River, as well as numerous other creeks and drainages. The headwaters of the upper Chehalis River originate in the Willapa Hills and foothills of the Cascade Range, while those of the lower Chehalis River originate in the foothills of the Olympic Range. Other tributaries that feed directly into Grays Harbor include the Hoquiam River, Humptulips River, Elk River, and Johns River. Headwaters for these drainages originate in the Willapa Hills and Olympic foothills. Much of the land in these basins consists of evergreen forests on the upper and middle slopes in active forestry use; mixed coniferous/deciduous forests on mid- to lower slopes and along the edges of river valleys; and agricultural lands in river valleys and associated lowlands. Agricultural land use is more extensive in the area of the upper Chehalis River.

Annual precipitation in the Chehalis River watershed is approximately 40 inches in the lowland valleys and over 100 inches in the Willapa Hills and Olympic foothills, with most of the precipitation

occurring during the winter months when water demands are the lowest. Summers are typically dry, with little to no rainfall, so naturally low streamflows are primarily dependent on groundwater inflow. These conditions coincide with the highest water demands for human uses, including irrigation and municipal water supply, as well as the state's requirements to maintain instream flows to ensure adequate water quality and fish migration under the instream flow rule for the Chehalis River Basin (Washington Administrative Code 173-522). Consequently, there is very little water available for new uses (Washington State Department of Ecology 2012a:1–2).

3.3.4.2 Surface Waters

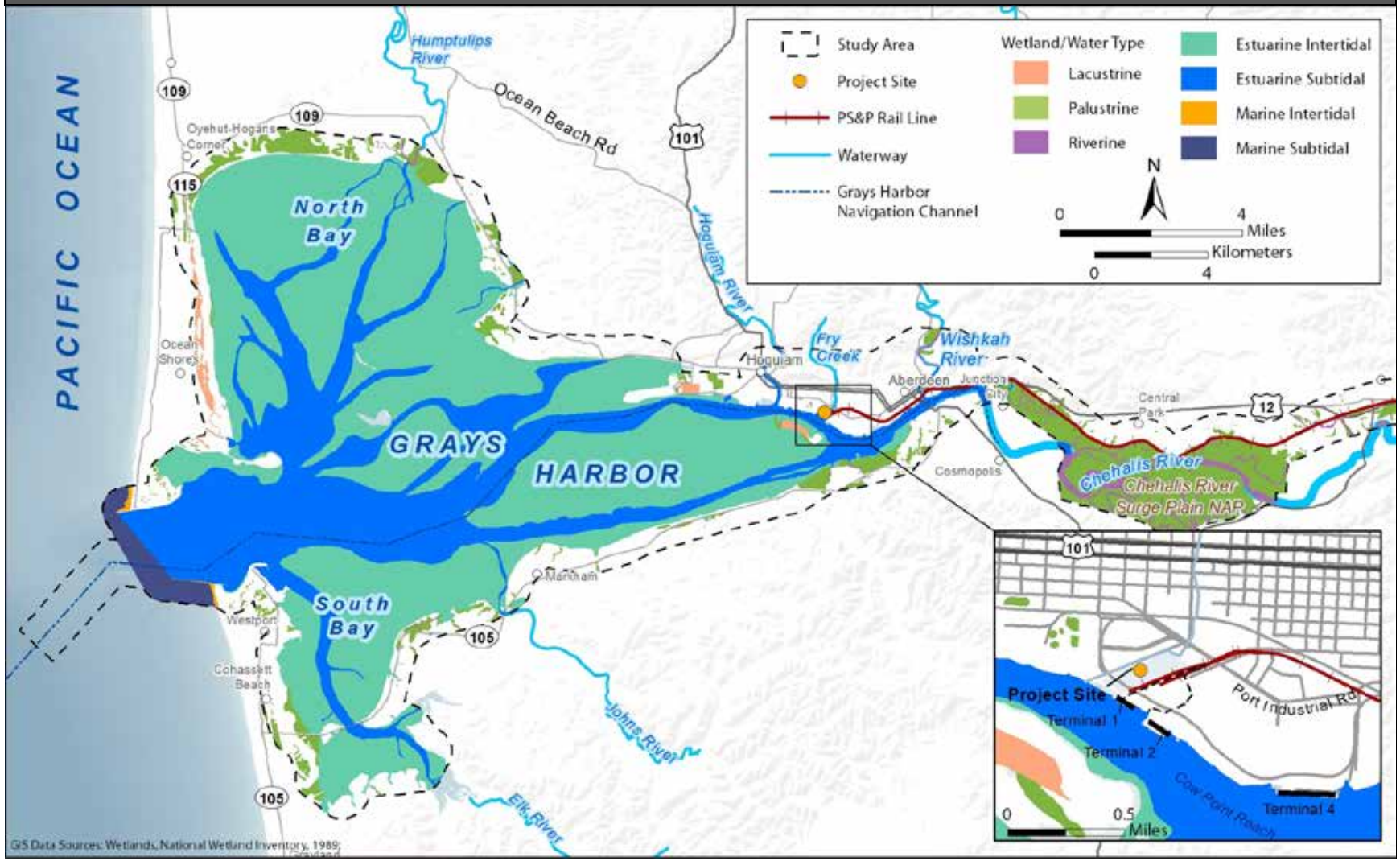
Surface waters are bodies of open water that flow and collect on the surface of the earth. They include streams, rivers, lakes, estuaries, and the ocean. For the purposes of this report, they do not include wetlands, which are generally considered transitional areas between open waters and uplands and are discussed in Section 3.3.4.3, *Wetlands*. This section describes the location, general hydrologic characteristics, and water quality of surface water in the study area.

Project Site

This section addresses surface waters located on, adjacent to, or within 1 mile of the project site.

The project site is located in a developed industrial area owned by the Port of Grays Harbor (Port) (Figure 3.3-1). It is situated at Terminal 1, a bulk liquid loading facility located in Grays Harbor adjacent to the Cow Point Reach of the Grays Harbor Navigation Channel and Fry Creek. It is also within 0.5 mile of the mouth of the Chehalis River (Figure 3.3-1).

Figure 3.3-1. Wetlands, Water Bodies, and Waterways—Project Site and Grays Harbor



Water Bodies

This section describes the location and general characteristics of the surface waters on, adjacent to, or within 1 mile of the project site including Grays Harbor Navigation Channel, Fry Creek, and the Chehalis River.

Grays Harbor Navigation Channel

The Grays Harbor Navigation Channel provides shipping access between the Pacific Ocean and Cosmopolis on the Chehalis River. It is divided into nine discrete reaches—five inner harbor and four outer harbor—based on physical characteristics and dredging requirements. The project site is adjacent to the Cow Point Reach, an inner harbor reach that extends from Terminal 1 to the mouth of the Chehalis River. It includes the Cow Point Turning Basin, which lies just upstream of the project site, off the shorelines of Port Terminals 2 and 4. To maintain navigational depths, Cow Point Reach and Cow Point Turning Basin are typically dredged annually by the U.S. Army Corps of Engineers using contractor mechanical dredges. Channel dimensions in the Cow Point Reach are maintained at a minimum depth of -36 feet mean lower low water, with a channel width varying from 350 to 550 feet. Channel dimensions in the Cow Point Turning Basin are maintained at a minimum depth of -36 feet mean lower low water, with a channel width varying between 350 to 950 feet. Annual maintenance dredging typically takes 5 to 6 months to complete and is conducted by clamshell dredge between July and February. The average annual volume of material removed is approximately 750,000 cubic yards for the Cow Point Reach and approximately 215,000 cubic yards for the Cow Point Turning Basin. Dredged material is typically characterized by sandy silt and disposed of at the South Jetty or Point Chehalis in-water disposal sites (U.S. Army Corps of Engineers 2011:1–10).

Fry Creek

Fry Creek is adjacent to the project site, along its northern boundary, between the project site and John Stevens Way (Figure 3.3-1). It consists of an excavated, trapezoidal channel that connects Fry Creek to the Chehalis River and Grays Harbor through property owned by the Port. Fry Creek is a small headwater stream that drains approximately 3.75 square miles of residential/commercial areas and forested slopes to the north of the proposed expansion site. It enters the diversion channel to the northeast of the project site via a culvert located under Port Industrial Road. The diversion channel is subject to tidal action and known to support the presence of coho salmon, winter steelhead, and fall Chinook salmon (Washington Department of Fish and Wildlife 2014).

Chehalis River Mouth

The convergence of Chehalis River and Grays Harbor is approximately 0.8 mile upstream of the project site (Figure 3.3-1). At the mouth, the Chehalis River is approximately 0.5 mile wide. The river experiences large diurnal tidal fluctuations and minor impacts from regulation of water flow of the Skookumchuck River from the Skookumchuck Dam (U.S. Geological Survey 2013). Tidal influence extends up to the Satsop River east of Montesano, Washington (Northwest Area Committee 2013:2-5).

Water Quality

According to Ecology's current Water Quality Assessment (i.e., 305(b) list), no portions of the surface waters adjacent to the project site are identified as Category 5 impaired waters (Washington State Department of Ecology 2012b). Category 5 listed waterbodies (i.e., the 303(d) list) are polluted

waters where water quality standards have been violated for one or more pollutants (Washington State Department of Ecology 2006:3). Category 5-listed waters require the development and implementation of Total Maximum Daily Loads projects (TMDL).

TMDLs establish pollutant load and wasteload allocations (for nonpoint and point sources, respectively) that will reduce or eliminate pollutant loading so that a waterbody will eventually meet water quality standards for those pollutants. Category 4a listed waterbodies are those that have a TMDL. The Grays Harbor bacteria TMDL established fecal coliform bacteria wasteload allocations for urban stormwater from Aberdeen, point sources including wastewater treatment plants and pulp mills, and for nonpoint sources to meet both the applicable fresh water and marine water quality standards. High bacteria concentrations can cause human illnesses and trigger commercial shellfish harvest closures.

In their current water quality assessment, Ecology identifies a portion of the navigation channel just downstream from the project site as a Category 2 water of concern for water column bioassay. A Category 2 listing indicates that there is evidence of a water quality problem, but not enough to require the development of a TMDL (Washington State Department of Ecology 2006:3). In this location, Ecology's determination was based on a bioassay study showing that effluent from the ITT-Rayonier paper mill did not have adequate dilution in the receiving water (Grays Harbor) to meet the *no effect* level for certain aquatic organisms (Washington State Department of Ecology 2012b). Another Category 2-listed site is located upstream from the project site, near the Port's Terminal 4 facilities. This site is listed as a water of concern for copper. Neither of these listed sites is covered by a TMDL.

Ecology also identifies several portions of the navigation channel adjacent to the project site as having sediments that meet sediment quality standards (i.e., Category 1 sediments or uncontaminated sediments[3]) for such contaminants as arsenic, bis (2-ethylhexyl) phthalate, cadmium, chromium, copper, fluoranthene, lead, mercury, high-molecular weight polycyclic aromatic hydrocarbons, silver, and zinc (Washington State Department of Ecology 2012b).

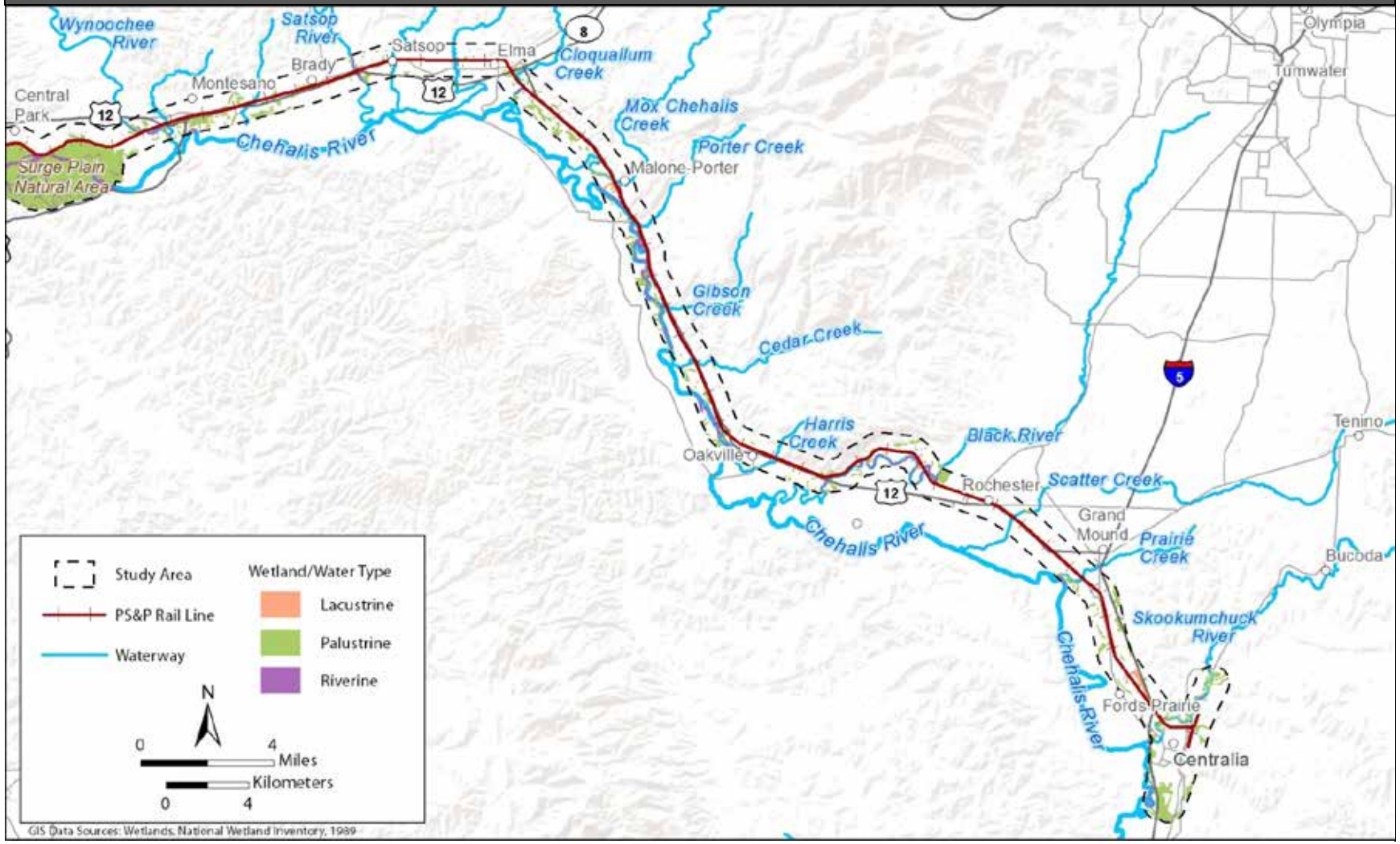
PS&P Rail Line

This section describes surface waters located on, adjacent to, or within 0.5 mile of the PS&P rail line.

The PS&P rail line extends along the Chehalis River Valley, running adjacent to the river in many locations but never crossing it (Figure 3.3-2). Along this route, the rail line crosses approximately 37 named and unnamed tributaries to the Chehalis River in both WRIAs 22 and 23, including the Wishkah River, Elliot Slough, Higgins Slough, Wynoochee River, Sylvia Creek, Camp Creek, Satsop River, Sherwood Creek, Newman Creek, Vance Creek, McDonald Creek, Cloquallum Creek, Mox Chehalis Creek, Porter Creek, Gibson Creek, Cedar Creek, Harris Creek, Roundtree Creek, Black River, Scatter Creek, Prairie Creek, and Skookumchuck River. The rail line runs within 1 mile of but does not cross several other named and unnamed tributaries including Mox Chuck Slough, Gaddis Creek, Davis Creek, Coffee Creek, and China Creek. Within 1 mile beyond the project site to the west, the rail line continues, crossing both Fry Creek and the Hoquiam River.

[3] Specific standards and classification categories relative to the standards are identified in WAC 173-240 for the purposes of managing sediment quality in the state. Category 1 sediments meet applicable sediment quality standards.

Figure 3.3-2. Wetlands, Water Bodies, and Waterways—PS&P Rail Line



Water Bodies

The mainstem Chehalis River and its tributaries form the Chehalis River Basin, which drains approximately 2,700 square miles (Figure 3.3-2). The basin is bounded by the Pacific Ocean to the west, the Deschutes River Basin to the east, the Olympic Mountains to the north, and the Willapa Hills and Cowlitz River Basin to the south. Elevations in the basin range from sea level at Grays Harbor to over 3,000 feet in the Willapa Hills and Olympic foothills (Chehalis River Basin Flood Authority 2010:7). Peak discharges from the Chehalis River (greater than 50,000 cubic feet per second [cfs]) occur during winter (December and January), and minimum flows (600 to 800 cfs) occur from June through September (Washington State Department of Ecology 2000a:3).

The mainstem and South Fork Chehalis drain uplands south and west of Chehalis. The Chehalis Basin includes WRIA 22 and 23. Two major tributaries in mid-basin, the Newaukum and Skookumchuck Rivers, have their headwaters in the foothills of the Cascade Range. Another mid-basin tributary, the Black River, originates in wetlands near Black Lake, in Thurston County. The largest tributaries, the Satsop and Wynoochee Rivers, arise in southern extensions of the Olympic Mountains and join the mainstem shortly before its terminus at Grays Harbor. The Humptulips, Hoquiam, and Wishkah Rivers also have their headwaters in the southern Olympic Mountains and flow into Grays Harbor. The Humptulips River flows into North Bay, the Hoquiam River into the inner estuary of Grays Harbor just downstream from the project site, and the Wishkah River into the Chehalis River near the mouth. The Johns and Elk Rivers flow into the South Bay of Grays Harbor. The terminus of all rivers is where they enter another river or Grays Harbor (saltwater influence) (Chehalis Basin Partnership 2004:III–3).

The following dams and diversion structures are on the rivers of the Chehalis River Basin.

- The Hoquiam and Wishkah Rivers have diversion structures to supply municipal and industrial water to the Hoquiam/Aberdeen area. These structures allow Hoquiam to remove 2.5 cfs from the Hoquiam River and Aberdeen to divert 10 cfs from the Wishkah River.
- The Wynoochee Dam on the Wynoochee River provides water for fish and wildlife habitat, irrigation, recreation, flood control, and municipal and industrial water supply for Aberdeen. The reservoir has a maximum retention capacity of 70,000 acre-feet.
- The Bloody Run Dam on the Skookumchuck River supplies up to 54 cfs for use in the Centralia Steam Electric plant.

Water Quality

Water quality issues in the Chehalis River and its tributaries have been recognized in studies since the early 1990s. Land use in the basin is mostly forestlands, interspersed with agricultural and residential areas. Intensive agriculture and irrigation occur in the low-lying valleys along the river and its tributaries. The most common water quality issues experienced in the basin are high water temperature, low dissolved oxygen, and fecal coliform (bacteria) exceedances of water quality standards (Washington State Department of Ecology 2014a). The major causes of these problems include degraded or inadequate riparian conditions, agricultural activities that do not incorporate best management practices (BMP) to protect water quality, failing septic systems, and urban stormwater runoff. High water temperatures and low dissolved oxygen levels negatively affect the growth and development of different life stages of salmon, including spawning, rearing, and migration. Fecal coliform contains human pathogens and high concentrations can make people sick when they are exposed to contaminated water.

According to Ecology's current U.S. Environmental Protection Agency-approved 303(d) Category 5 list, water quality impaired river segments are present in both the lower and upper Chehalis River watersheds (WRIAs 22 and 23). These include sections in the lower portion of the river that are considered impaired by mercury and polychlorinated biphenyl, and sections in the upper portion of the river that are considered impaired due to elevated levels of polychlorinated biphenyls, dioxin, and turbidity (Washington State Department of Ecology 2012b). As previously described, Category 5 impaired waters are those where water quality standards have been violated for one or more pollutants and TMDL action is required (Washington State Department of Ecology 2006:3).

Under Category 2, Ecology currently lists the lower Chehalis River as a water of concern for dioxin (specifically 2,3,7,8-tetrachlorodibenzo-para-dioxin).Sources of dioxins were addressed in the 1992 Grays Harbor Dioxin TMDL and this listing has not been reevaluated since. Portions of the upper Chehalis Watersheds are listed as a water of concern for temperature bacteria, pH, dissolved oxygen, and turbidity (Washington State Department of Ecology 2014b). These listings are addressed by the existing TMDLs.

Ecology lists multiple waterbodies in WRIA 22 and 23 on the 305(b) list under Category 4a for bacteria, temperature, and dissolved oxygen in water (Washington State Department of Ecology 2012b). Category 4a includes impaired waters that have TMDLs already in place (Washington State Department of Ecology 2006:3). The U.S. Environmental Protection Agency has approved TMDLs in Grays Harbor for dioxin and fecal coliform bacteria, and in the Upper Chehalis River Watershed for dissolved oxygen, temperature, and fecal coliform bacteria (Washington State Department of Ecology 1992, 2000b, and 2004a).

In 2004, Ecology published a detailed implementation (cleanup) plan for these pollutants in the Chehalis River/Grays Harbor watershed. The plan identified responsible entities for implementation of best management practices (BMPs) that will meet the TMDL goals (Washington State Department of Ecology 2004b). Implementation of BMPs to reduce or eliminate nonpoint sources of pollution covered by the Upper Chehalis River and Grays Harbor TMDLs is a coordinated effort between Ecology and stakeholders in the basin.

Limiting Factors to Fisheries

The mainstem Chehalis River has been severely affected by channel incision, sedimentation, and reduction in streamflow, and many of these problems are seen in its tributaries. Increased peak flows due to urbanization, disconnected floodplains and lack of channel complexity, extensive loss of riparian habitat due to agriculture and urbanization, and improperly managed upland forestry practices are believed to be causes of the changes in river geomorphology. These changes have resulted in adverse water quality conditions for fish, particularly warm water temperatures and low dissolved oxygen levels.

High stream temperature problems are related to increased erosion altering channel dimensions and loss of riparian vegetation exposing rivers and creeks to direct solar radiation. Whereas, low dissolved oxygen levels are caused by increased nutrients in runoff from agricultural and residential land uses, increased primary productivity due to lack of shade, and urban stormwater pollution. It is also likely that the reduction in wetlands has contributed to degraded water quality.

Additionally, lower baseflows and higher peak flows threaten fish habitat. Since 1953, Chehalis River flows have decreased 19% whereas annual precipitation decreased by only 6% (Washington State Conservation Commission 2001:17). Lower stream flows are the result of climate change and

increased water use for irrigation, power generation, and domestic water use. Increases in groundwater withdrawals are also thought to lower summer baseflow conditions (Washington State Conservation Commission 2001:17).

Grays Harbor

This section briefly describes the location, general characteristics, and water quality of surface waters located in the portions of Grays Harbor that are greater than 1 mile away from the project site, including surface waters within 0.5 mile of the shoreline of Grays Harbor (Figure 3.3-1).

Water Bodies

Grays Harbor is a large estuary fed by a 2,600-square-mile drainage basin. The estuary was formed by sedimentation and erosion caused by the Chehalis River, which enters the east end of the harbor, and the Pacific Ocean, which connects with the harbor to the west through a 1.8-mile-wide inlet. Grays Harbor is approximately 15 miles long and 13 miles across at its widest point, narrowing to fewer than 100 yards in some places. Grays Harbor is in the Chehalis River Valley, and is continually filled in with river-borne sediments and marine deposits. Shorelines inside Grays Harbor consist primarily of marsh and sheltered tidal flats (Northwest Area Committee 2013:2-1–2-2).

Water depths throughout most of Grays Harbor are usually less than 20 feet. However, depths up to 80 feet have been measured at the mouth of the harbor. Grays Harbor has three main channels: north channel, middle channel, and south channel. The north channel contains the Grays Harbor Navigation Channel, a 27.5-mile channel that extends from the Pacific Ocean to Cosmopolis. Its nine reaches are the Entrance Channel, Point Chehalis, South, Outer Crossover Channel, Inner Crossover Channel, North Channel, Hoquiam, Cow Point, and Aberdeen Reaches. The majority of the navigation channel is 350 feet wide, increasing to 1,000 feet wide at the harbor entrance. It is currently maintained at an authorized depth of -36 feet mean lower low water up to the Terminal 1 and 2 docks and at 32 feet mean lower low water between the Terminal 4 dock and South Aberdeen (U.S. Army Corps of Engineers 2015)[4]. The middle and south channels remain shoaled by erosion and sediment deposits. Numerous shallow channels created by ebb tide flows and river discharges are present throughout the harbor (Northwest Area Committee 2013:2-2).

Net surface flow in the harbor is seaward and dominated by tidal currents, with a mean tide rise of about 9 feet (National Oceanic and Atmospheric Administration 2015:257). Tides of this height typically cover up to 94 square miles in Grays Harbor, while at mean lower low water, low tides typically cover fewer than 38 square miles, exposing large areas of mudflats, sandbars, and low islands dissected by multiple shallow channels (U.S. Army Corps of Engineers 2014:58). High flows on the Chehalis River can control currents in the upper portion of the harbor, especially during the winter when storms increase the flow in rivers and streams that feed Grays Harbor. The largest source of fresh water is from the Chehalis River. Other significant sources of fresh water from the north include the Hoquiam, Humptulips, and Wishkah Rivers and Chenois and Grass Creeks. The major contributing freshwater sources from the south are Elk River and Johns River (and tributaries), and Andrews, Barlow, Gold, O'Leary, Stafford and Chapin Creeks. Seasonal freshwater input creates a range of salinity from 5 parts per thousand during the winter to 20 parts per thousand in the summer (Northwest Area Committee 2013:2-2).

[4] The U.S. Army Corps of Engineers was recently authorized to increase the minimum depth to -38 feet MLLW in a 14.5- mile section of the navigation channel under the Grays Harbor Navigation Improvement Project.

The form and structure of Grays Harbor are largely determined by differences in the capacity of harbor inflows (flood currents) and ocean waves that transport sediment into the harbor and outflows (ebb currents) that transport sediment out of the harbor. Sediment accumulation in the seaward portion of the harbor is controlled primarily by redistribution of harbor silt by wind and waves and deposition of ocean sands by tidal action; sediment accumulations in the interior harbor are controlled by river inputs (U.S. Army Corps of Engineers 2014: 59).

Beyond the harbor to the west, the connection to the Pacific Ocean extends between two low-lying peninsulas. The ocean side of the inlet is protected by two rock jetties (north and south) that include above-water and submerged sections. As defined in 33 Code of Federal Regulations (CFR) 80.1375 (International Regulations for Preventing Collisions at Sea Demarcation Lines, Grays Harbor, WA) the regulatory transition between inland waters and the territorial sea is demarcated by a line extending between seaward extremities of the above-water portion of these jetties. The Bar Channel Reach, which is approximately 1,000 feet wide with a minimum maintained depth of 46 feet, approaches the entrance from the southwest then turns eastward into the Entrance Channel Reach of the navigation channel. Outside of the harbor entrance, open, fine-grained sandy beaches extend along the coastline for several miles to the north and south. To the west, the Pacific Ocean overlies the continental shelf extending out and beyond the 3-nautical-mile limit of state jurisdiction. Within the 3-nautical-mile zone, a relatively shallow (2 to 18 feet deep) area extends approximately 0.25 to 0.5 nautical mile seaward from the beach, with a deeper (19 to 78 feet deep) area extending from there to the 3-nautical-mile limit.

Water Quality

Water quality in Grays Harbor is affected by discharges of effluents from multiple wastewater treatment facilities and pulp and paper mills; runoff from chemical usage for pest control and wood preservation usage; and loss of estuarine habitat from diking and filling to promote urban development and shipping and railroad access in tidally affected areas. The introduction and spread of invasive exotic plants and animals have also contributed to water quality degradation in the harbor.

The industrial use of Grays Harbor shoreline and waterways has led to past water quality problems for the Chehalis River and inner harbor[5] near Hoquiam and Aberdeen. Inner Grays Harbor remains listed as a Category 4a impaired water under Clean Water Act Section 303(d) for dioxin (Washington State Department of Ecology 2012b).

A portion of outer Grays Harbor north of Westport in the mouth of the harbor is listed on the Section 303(d) list as a Category 5 impaired water for dieldrin, an organochloride insecticide (Washington State Department of Ecology 2012b). As of 2014, no TMDL had been developed for this impairment.

Both inner and outer Grays Harbor (and the lower Chehalis River) were listed as impaired under Clean Water Act Section 303(d) for fecal coliform bacteria on the 1996 and 1998 Section 303(d) lists due to inadequate controls of point or nonpoint sources in the harbor and its freshwater tributaries (Washington State Department of Ecology 2000a:1; 2002:1, 3). Identified point sources of fecal coliform bacteria included the sewage treatment plants in Hoquiam, Aberdeen, Ocean Shores, and Westport; multiple sewage lift stations and collection systems associated with these facilities; various industrial wastewater treatment plants; and two local marinas (Washington State

[5] The inner region of Grays Harbor is east of longitude 123°59’ W to longitude 123°45’45” W.

Department of Ecology 2000a:3–7). Potential nonpoint sources included onsite septic-systems, and agricultural activities. The Grays Harbor Chehalis Watershed Fecal Coliform Bacteria TMDL was approved by the U.S. Environmental Protection Agency in 2003 (Washington State Department of Ecology 2002). Wasteload allocations for permitted point sources of fecal coliform are include municipal sewage treatment plants and industrial permittees including Ocean Spray Cranberries, Grays Harbor Paper, Weyerhaeuser, Merino's Seafoods, and Washington Crab. With this TMDL in place, bacteria listings in Grays Harbor and its freshwater tributaries remain Category 4a (Washington State Department of Ecology 2012b).

Several portions of both inner and outer Grays Harbor are listed in the current water quality assessment as Category 4c due to the presence of green crab (*Carcinus maenas*), an invasive exotic species (Washington State Department of Ecology 2012b). Category 4c waters are those that are impaired by a nonpollutant such as an invasive exotic species or a type of pollution that is not appropriately addressed through the TMDL process (Washington State Department of Ecology 2006:14–15). Additional information on green crab is provided in Section 3.5, *Animals*.

Ecology currently identifies inner Grays Harbor as a water of concern (category 2) for copper and temperature and outer Grays Harbor as a water of concern for dissolved oxygen, temperature, and bacteria (Washington State Department of Ecology 2012b). Category 2 listing indicates that there is some evidence of a water quality problem, but no TMDL has been developed to address these at this time. An assessment of water quality is being developed by Ecology. Inner Grays Harbor is listed for ammonia-nitrogen under Category 1, which indicates that water quality monitoring shows that the waterbody has met standards for this pollutant.

Outer Grays Harbor[6] is listed as impaired due to fecal coliform under Category 4a. Bacteria load allocations for inner and outer Grays Harbor are contained within the same TMDL (Washington State Department of Ecology 2002). The majority of this area has been classified as approved for commercial shellfish harvest. The National Shellfish Sanitation Program (NSSP), the federal/state cooperative program recognized by the US Food and Drug Administration and implemented by the Washington Department of Health, sets fecal coliform bacteria criteria for marine waters that can determine whether a growing area remains open for harvest or not.

Limiting Factors to Fisheries

Severe water quality problems were documented in 1992 in Grays Harbor that resulted in a significant loss of coho smolt production (Washington State Conservation Commission 2001:16).

Since the 1990s, shellfish growers in outer Grays Harbor have experienced repeated temporary closures from elevated levels of fecal coliform bacteria (Washington State Department of Ecology 2014b). Much of this contamination has been attributed to permit effluent limit violations as well as to nonpoint sources of fecal coliform from onsite septic systems, agricultural operations, and stormwater runoff.

Sediment Quality and Contamination

Dioxin has been found in the sediments immediately downstream of the outfalls from the pulp mills; historical accumulations of this and other persistent bioaccumulative toxics (related to industrial

[6] The outer region of Grays Harbor is west of longitude 123 degrees 59’ W.

and urban activities) could be released from sediments during dredging activities. Testing of the sediments prior to dredging indicates dioxin concentrations are below the current guidelines for Grays Harbor.

The U.S. Army Corps of Engineers conducted sediment fecal coliform tests and analyses to assess potential impacts on commercial shellfish beds from dredging/disposal operations in Grays Harbor. Findings of this study show that the Chehalis River is the primary source of sediment in Grays Harbor. Peak winter loads of sediment from the Chehalis River carry bacteria as attached particles from livestock waste and municipal sewer discharges (Washington State Department of Ecology 2000a).

3.3.4.3 Wetlands

Wetlands are transitional areas between areas of open water (e.g., streams, rivers, lakes) and uplands. For regulatory purposes under the Clean Water Act (33 U.S.C. 1251), wetlands are defined as "those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions" (Protection of Environment Definitions, 40 CFR 230.3(t)). Common examples of wetlands are swamps, marshes, and bogs. This section describes wetlands in the study area.

No wetlands are present on or within 300 feet of the project site. The closest wetlands are located on and around Rennie Island, which lies approximately 1,500 feet to the southwest across the Chehalis River channel. Rennie Island is surrounded by a band of tidally exposed mudflats, salt marsh, and tidally influenced forested and scrub-shrub wetlands (Vincent 1978:23–26). The interior of the island also contains emergent wetlands and open water areas associated with a former effluent pond from the now defunct ITT Rayonier pulp mill. Several artificially created treatment ponds are also present to the northwest of the project site, the site of the former pulp mill. Although these constructed features are mapped as wetlands by National Wetland Inventory, they are not likely to be considered waters of the United States under the Clean Water Act (33 U.S.C. 1251). According to the Protection of Environment Definitions (40 CFR 122.2), waste treatment ponds designed to meet the requirements of the Clean Water Act are not waters of the United States.

Wetlands in Grays Harbor include widespread intertidal estuarine wetlands and special aquatic sites including both low and high salt marshes, subtidal open waters, large eelgrass beds, extensive mudflats, and scattered macroalgae beds on rocky shoreline and jetty substrates. Forested, scrub-shrub, and emergent wetlands are also present around the perimeter of Grays Harbor, both along the shoreline and extending inland along contributing rivers, streams, and drainages. A few rare types of wetlands are also present, including low-elevation freshwater wetlands that support bog-like conditions and interdunal wetlands. The wetlands and special aquatic sites of the estuary provide many important functions, including floodwater retention, sediment and pollutant filtration and removal, shoreline erosion control, groundwater recharge, carbon sequestration, and fish and wildlife habitat provision.

The Chehalis River surge plain consists of a 3,018-acre area that extends upstream along the river from the eastern side of Aberdeen to the river's confluence with the Wynoochee River. In this area, heavier saltwater from incoming high tides forms a wedge under the fresh river water, lifting it up and forcing it to surge out over low-lying floodplain areas. This hydrologic regime forms a unique type of wetland system known as a freshwater tidal surge plain, which is characterized by tidal

sloughs, intermittently flooded areas, and regularly flooded areas. This diversity of hydrologic regimes supports a variety of forested, scrub-shrub, and emergent wetlands including the largest Sitka spruce-dominated coastal surge plain wetland in Washington State (Washington State Department of Natural Resources 2009:3). Because of its large size, flat topography, and minimal development, the surge plain provides important ecosystem services to the surrounding communities by slowing and storing floodwaters and filtering sediments as they move downstream toward the Grays Harbor estuary. It also provides extensive wildlife habitat for a variety of amphibians, reptiles, various small and large mammals, and a variety of birds, including bald eagle and other special status species. The surge plain also provides important habitat for anadromous fish and critical spawning habitat for resident fish. Approximately 2,345 acres of this area are managed and protected by the Washington State Department of Natural Resources as part of the Chehalis River Surge Plain Natural Area Preserve. The PS&P rail line runs just outside the northern edge of the surge plain and Natural Area Preserve for 5.5 miles.

Multiple wetlands of varying types are also present along the segment of the PS&P rail line that extends between the upstream end of the Chehalis River surge plain and Centralia. Such areas occur in association with the rivers, streams, and former channels crossed by the rail line, and in adjacent riparian and agricultural areas. Wetland types include freshwater forested, scrub-shrub, and emergent wetlands, as well as open-water areas that support aquatic vegetation. Hydrology for these areas is typically provided by overbank flooding, overland flow, groundwater seepage, or direct precipitation.

3.3.4.4 Floodplains

Floodplains are lowlands adjacent to rivers and streams that are subject to flooding from instream flows that overtop the channel banks. This section describes floodplains in the study area.

The project site does not lie within a designated Special Flood Hazard Area or a 100-year floodplain (e.g., Zone A or V) per the FEMA mapping currently in effect for this area (Appendix E, *FEMA Flood Insurance Rate Maps*). It is mapped as an *area of minimal flooding* (Zone C) on the original and revised Flood Insurance Rate Maps for Hoquiam and Aberdeen, Washington (Federal Emergency Management Agency 1979, 1984, 2006a, 2006b). Areas of minimal flooding are defined by FEMA as being outside the Special Flood Hazard Area and higher than the elevation of the 0.2% annual chance (i.e., 500-year) flood (Federal Emergency Management Agency 2011:29). The portion of Chehalis River bordering the project site is mapped as *areas of 100-year coastal flood with velocity (wave action); base flood elevations and flood hazard factors determined* (Zone V2), which is considered a Special Flood Hazard Area (Federal Emergency Management Agency 1979, 1984, 2006a, 2006b). Many of the urban areas north and east of the project site are also within the 100-year floodplain Special Flood Hazard Area (Zone A), including the PS&P rail line from the west end of the Hoquiam River rail bridge to the US 12 crossing of Wilson Creek. The Poynor Yard in Aberdeen and the rail bridge over the Wishkah River also lie within this zone.

Since 2012, FEMA has been working with a contractor, Strategic Alliance for Risk Reduction, Washington State Department of Natural Resources, and other state and local agencies to complete a multihazard risk assessment for Grays Harbor County under its Risk Mapping, Assessment, and Planning program. The purpose of this study is to identify potential building losses due to floods, earthquakes, tsunamis, and landslides so that local communities can better plan their development policies and enhance their natural disaster mitigation plans. As part of this study, the Flood Insurance Rate Maps for coastal communities in the county, including those for the project site, have

been updated and reissued as preliminary maps pending public review and final approval by FEMA. The October 25, 2013 preliminary Flood Insurance Rate Map issued by FEMA shows the entire project site as being in Zone X, which is defined as *areas determined to be outside the 0.2% annual chance flood* (Federal Emergency Management Agency 2013). The portion of Grays Harbor that borders the project site is mapped as Zone AE (EL 13). This zone is defined by FEMA as a Special Flood Hazard Area subject to inundation by the 1% annual chance flood, where the base flood elevation has been determined at 13 feet National Geodetic Vertical Datum of 1988.

Outside of the project site, most of the surrounding shoreline of Grays Harbor is within the 100-year floodplain (Zones A and V on the effective maps and Zones AE and VE on the preliminary maps), which also extends up several of the contributing rivers and streams. The PS&P rail line crosses several mapped flood hazard areas between its origin in Centralia, Washington and terminus at the project site. These include the 100-year floodplains (Zone A) of Skookumchuck River, Scatter Creek, Black River, Roundtree Creek, Harris Creek, Cedar Creek, Gibson Creek, Porter Creek, Mox Chehalis Creek, Delezene Creek, Newman Creek, Satsop River, Sylvia Creek, Wynoochee River, Higgins Slough, Elliot Slough, Wishkah River, and Chehalis River (Washington State Department of Ecology 2014c). The rail line also crosses the 100 to 500-year floodplains (Zone B) of Dry Bed Creek and Vance Creek.

3.3.4.5 Groundwater

Groundwater is the water that flows and collects beneath the Earth's surface in the cracks and spaces in soil, sand, and rock. The geologic features that store and transmit groundwater are known as aquifers. Groundwater interfaces with surface waters via springs and as baseflow in streams and rivers. This section describes groundwater resources in the study area.

Project Site

As described in Section 3.1.4.1 of *Earth*, the project site is located on top of a former marine slip (Port of Grays Harbor Slip 1) that was filled with hydraulically placed dredged material from the Chehalis River between 1983 and 1994. This fill was subsequently capped with fill excavated during the widening of US Route 12 (US 12) at the east end of Aberdeen (GeoEngineers 2006:11). Geotechnical investigations conducted by GeoEngineers in 2006 determined that fill composition primarily includes interbedded silts and sands to an approximate depth of 74 feet. Groundwater borings performed at the project site in 2006 encountered groundwater at depths of approximately 10 feet below ground surface (GeoEngineers 2006:4). In 2011, the Port placed additional fill on the northern portion of the project site, along Fry Creek. Following fill placement in this area, groundwater was encountered at 1 to 7 feet below ground surface during a 2012 Phase II environmental site assessment (GeoEngineers 2012:7). Groundwater depth likely fluctuates with tide stage. Although general movement underneath the project site is not explicitly known, the inferred direction of groundwater flow is southerly towards the harbor and likely discharges into the Chehalis River.

According to federal and state database searches, no drinking water wells are located on or within 1 mile of the project site. Groundwater quality is generally impaired due to lube oil-range petroleum products. Other contaminants may be present but not at levels that require cleanup. Fry Creek, which is located to the northwest of the project site, likely acts as a barrier to groundwater migration to the north and west. However, contaminated groundwater does likely discharge via the Chehalis River towards the Harbor (GeoEngineers 2012:4).

PS&P Rail Line

The majority of the PS&P rail line between Centralia and Grays Harbor runs through the Chehalis River Valley, which is underlain by glacial drift and alluvial (water deposited) sediments from the Chehalis River and its tributaries. Many of these sediments support surficial aquifers[7] within thick glacial and alluvial deposits (Washington State Department of Ecology 1998:9). The two principal alluvial aquifers present in the Chehalis River Valley are informally known as the East Chehalis Surficial Aquifer and the West Chehalis Surficial Aquifer. Both consist of laterally extensive deposits of interbedded clay, silt, sand, and gravel laid down in former floodplains, alluvial fans, and low river terraces (Washington State Department of Ecology 1998:1). Groundwater flow within these aquifers generally spreads from upland recharge areas along their perimeter toward natural discharge points along streams and tributaries, as well as moving downward to recharge regional aquifers (Washington State Department of Ecology 1998:v).

The East Chehalis Surficial Aquifer extends upstream from the Scatter Creek confluence with the mainstem Chehalis River south of Rochester to the confluence of the South Fork Chehalis River beyond Centralia. Depth to groundwater in this aquifer varies from 10 to 30 feet below ground surface, with the aquifer thickness being around 90 feet near Fords Prairie (Washington State Department of Ecology 1998:14).

The West Chehalis Surficial Aquifer extends from the river mouth at Grays Harbor to the Scatter Creek confluence with the mainstem of the Chehalis River. Groundwater throughout this aquifer is directly coupled to the Chehalis River. Between Aberdeen and Elma, the aquifer consists of two zones: an upper zone that extends to approximately 100 feet below ground surface, and a lower, more permeable zone located between 100 to 200 feet below ground surface (Washington State Department of Ecology 1998:15). The lower layer is the principal aquifer in the area due to its better water quality and yield. In general, the water table is less than 20 feet below ground surface throughout most of this reach.

From Elma upstream to Oakville, the West Chehalis Surficial Aquifer is limited to one shallow zone composed of highly permeable course-grained alluvium and reworked glacial drift (Washington State Department of Ecology 1998:15). Water table depths are typically less than 20 feet below ground surface and fluctuate closely with the water level in the Chehalis River. Percolation of water to the water table is rapid and horizontal hydraulic conductivity is high, supporting highly productive wells. Deposits in the former floodplain (terraces) of the Chehalis River in this reach also yield significant amounts of groundwater, although they are not as thick as the adjacent alluvium (Washington State Department of Ecology 1998:15).

These aquifers provide a local water source for farms, private residences, and public water systems. Along the PS&P rail line, several wells within 0.25 mile of the rail line provide domestic and municipal drinking water, as well as water for irrigation and industrial uses (Washington State Department of Ecology 2014b). Because of the shallow water table and hydraulic connection to the Chehalis River and other waterbodies, these aquifers are susceptible to groundwater contamination due to several hydrogeological factors including the depth to groundwater, highly conductive soils, presence or absence of near-surface clay layers, and the nature and rate of contaminant loading

[7] Surficial aquifers are defined as the uppermost saturated zone, typically an unconfined aquifer, or mapable extreme (Washington State Department of Ecology 1998:v). Surficial aquifers in the Chehalis River watershed typically lie only a few feet below land surface and extend to a depth no more than 100 feet.

(Washington State Department of Ecology 1998:16). Thurston County has designated much of the Black River and Scatter Creek subwatersheds as a Critical Aquifer Recharge Area under its Critical Areas Ordinance (Thurston County Washington 2010). While Grays Harbor County and Lewis County have not designated any such recharge areas in their jurisdictions, similar hydrogeological conditions exist along the Chehalis River in those counties.

3.3.4.6 Stormwater

Stormwater is water that falls on the Earth's surface during precipitation events (e.g., rainfall, snow, and ice melt). It includes the portion of this water that infiltrates into the ground and that which accumulates on or flows over the ground surface on its way to a receiving water (stormwater runoff).

Stormwater that falls on the paved surfaces (approximately 9.5 acres covered with impervious asphalt and concrete) of the project site is handled in the following ways.

- Stormwater that falls on the vegetable oil feedstock and biodiesel storage tank containment areas, the containment area underlying the rail spur used for loading and unloading glycerin byproduct and sodium methylate, and the truck loading and unloading areas collects in sumps, where it is visually inspected before being manually released to the Port's stormwater conveyance system. Once released, this water flows to an oil/water separator before being discharged to Grays Harbor via the Port outfall located next to the Terminal 1 dock (Chapter 2, *Proposed Action and Alternatives*, Figure 2-2). If water in the sumps is contaminated, it can be treated in place or, if necessary, pumped out by a certified wastewater hauler and taken to an appropriate treatment facility.
- Stormwater that falls within the methanol/sodium methylate storage tank containment area and the biodiesel production area is collected and sent to the City of Aberdeen's publicly owned treatment works along with other production water (e.g., cooling tower blowdown, steam reboiler blowdown).
- Stormwater that falls on developed areas of the project site outside of the tank containment areas flows into catch basins that drain into the Port's stormwater conveyance system. This flow is conveyed into the oil/water separator before being discharged to Grays Harbor via the Port outfall next to the Terminal 1 dock.

Stormwater that falls on the remaining 13.4 acres of the project site that are unpaved and mostly vegetated typically infiltrates into the ground. Any surface runoff is directed into two temporary sedimentation ponds that were constructed in 2011, following the placement of fill material at the project site. These ponds are equipped with overflow structures that discharge to Grays Harbor. According to the Port, neither of these overflows has been used because the ponds have never filled to the level of the outfall riser before being discharged to Grays Harbor via the Port outfall near the northwest corner of the project site (Chapter 2, *Proposed Action and Alternatives*, Figure 2-2).

Stormwater from the project site that is discharged to Grays Harbor through the two Port outfalls is covered under the applicant's current NPDES Industrial Stormwater General Permit (Permit No. WAR006655). Under this permit, the applicant must monitor stormwater discharges for turbidity, pH, oil sheen, total copper, and total zinc. In addition, as a biodiesel production facility with a Standard Industrial Classification of 2869, the applicant must also monitor for certain parameters specific to the Chemicals and Allied Products industrial group. These include 5-day biochemical oxygen demand, nitrogen (nitrate and nitrite), and total phosphorus.

Stormwater discharged to the Aberdeen treatment works is covered under the applicant's individual Washington State Waste Discharge Permit (Permit ST0006214). Under this permit, the applicant is required to monitor for the following parameters: flow, 5-day biochemical oxygen demand, total suspended solids, oil and grease, pH, temperature, sulfate, lead, and magnesium. Effluent limits are assigned to flow (35,000 gallons per day), pH (6.0 to 9.0 Standard Units), 5-day biochemical oxygen demand (300 milligrams per liter) total suspended solids (350 milligrams per liter), oil and grease (300 milligrams per liter), and temperature (65° Celsius).

3.3.5 What are the potential impacts on water?

This section describes impacts on water that could occur in the study area. Potential impacts of the no-action alternative are described first, followed by the potential impacts of the proposed action.

3.3.5.1 No-Action Alternative

Under the no-action alternative, the applicant would continue to operate its existing facility as described in Chapter 2, Section 2.1.2.2, *Existing Operations*, and some potential for impacts on water quality that could affect vegetation would continue similar to existing conditions. Although the proposed action would not occur, it is assumed that growth in the region would continue under the no-action alternative, which could lead to development of another industrial use at the project site within the 20-year analysis period (2017 to 2037). Such development could result in impacts similar to those described for the proposed action.

3.3.5.2 Proposed Action

This section describes the impacts that could occur in the study area as a result of construction and routine operation of the proposed action. First, this section describes impacts from construction of the proposed action. It then describes impacts of routine operation at the project site and of routine rail and vessel transport to and from the project site.

Construction

As described in Chapter 2, *Proposed Action and Alternatives*, construction of the proposed action would be limited to the project site, with no construction activities occurring in Grays Harbor, Fry Creek, or along the existing PS&P rail line. Although onsite construction would occur within 200 feet of the shorelines of Grays Harbor and the Fry Creek, no dredge or fill operations or other inwater construction work would be required in these waters or any other surface waters, wetlands, or floodplains. Consequently, construction of the proposed action is not expected to result in any permanent impacts on water resources in the study area. Temporary impacts on water resources could occur from construction activities that involve soil disturbance, equipment and material use, and storage tank hydrostatic testing. Construction would not affect wetlands because wetlands are not present on or within 300 feet of the project site.

Soil Disturbance

Construction of the proposed action would include ground-disturbing activities that would require exposure of soils and soil stockpiling. Rainfall on these areas could transfer sediments into adjacent waterways via stormwater runoff. Such flows could enter Grays Harbor or the Fry Creek by flowing from the project site over the shoreline or through the Port's stormwater conveyance system. The

potential for erosion during most cut and fill activities is considered to be relatively low because the construction site is level; however, placement of stockpiles in proximity to storm drain inlets or the shoreline could increase the potential for sediment-laden runoff to enter adjacent waterbodies. Such discharges could temporarily increase the total suspended solids in these waters, increasing turbidity and potentially affecting surface water quality through interference with photosynthesis, oxygen exchange, and the respiration, growth, and reproduction of aquatic species. Other pollutants, such as nutrients, trace metals, and hydrocarbons, could adsorb to sediment and be transported to other locations within Grays Harbor, potentially degrading water quality in these areas.

Construction projects in Washington that engage in clearing, grading, and excavating activities that disturb one or more acres and discharge stormwater to surface waters of the state are required to obtain and comply with an NPDES Construction Stormwater General Permit from Ecology (NPDES Permit Program, Washington Administrative Code [WAC] 173-220]).

The NPDES permit will require the preparation of a temporary erosion and sedimentation control plan, a stormwater pollution prevention plan for construction, and BMPs to control the risk of erosion. These actions would reduce sedimentation of waterways and loss of topsoil. As a performance standard, the BMPs would represent the best available technology that is economically achievable and the best conventional pollutant control technology to reduce pollutants. Commonly practiced BMPs may consist of a variety of measures taken to reduce pollutants in stormwater and other nonpoint-source runoff consistent Ecology directives (Washington State Department of Ecology 2012c).

The Cities of Hoquiam and Aberdeen also require critical areas (Critical Areas Ordinance Hoquiam Municipal Code [HMC] 11.06 and Aberdeen Municipal Code [AMC] 14.100) and local land use development permits prior to construction. Implementing the plans and BMPs required by these permits would reduce the potential for impacts resulting from soil disturbance.

Equipment and Material Use

The delivery, handling, and storage of construction materials and wastes, as well as the use of heavy construction equipment during construction could provide potential sources for stormwater contamination. Use and maintenance of heavy equipment could result in leaks or accidental spills of vehicle fluids on exposed parts of the equipment or onto the ground, where it could enter the groundwater aquifer via infiltration or nearby surface waterbodies through surface runoff. Constituents in vehicle fluids such as fuel, oil, hydraulic fluid, and grease could be acutely toxic to aquatic organisms and could bioaccumulate in the environment. Chemicals used during construction including paints, solvents, and cleaning agents could also enter surface water and groundwater through infiltration and stormwater runoff if such substances are spilled or exposed to precipitation. These substances can also be toxic to aquatic organisms and can degrade water quality.

Waste materials such as metals, welding wastes (e.g., scrap electrodes, slag, flux), and uncured concrete can pollute water resources. Waste metals and welding wastes contain heavy metals and other chemicals and uncured concrete has a high pH, all of which can be harmful to water quality and aquatic organisms (Washington State Department of Ecology 2012c).

As discussed above, the applicant would be required to develop and implement a site-specific stormwater pollution prevention plan for construction that includes BMPs for material handling and construction waste management would reduce the potential for water resource impacts from these sources.

Hydrostatic Testing

As part of construction, all new storage tanks would need to undergo hydrostatic testing. The hydrostatic testing process involves completely filling each tank with water and allowing it to sit for a period to check for leaks or defects in the tank structure. Upon completion of the test, this water is typically discharged to a nearby surface water body, released to a stormwater/sanitary sewer system, allowed to infiltrate into ground, or hauled off to a licensed disposal facility. If discharged to a surface water or onto the ground, impacts could include the transport of residual chemicals and other materials from tank construction, as well as any additives added to the water for testing (e.g., dyes, biocides), into surface waters or groundwater, potentially affecting their water quality. Depending on the discharge method and rate, the discharge of several million gallons of hydrostatic testing water could also cause erosion and increase turbidity in the receiving waters. Potential impacts on water quality by the introduction of contaminants and increased turbidity would be similar to those previously discussed.

The applicant would use industrial water from the City of Aberdeen's water supply system for hydrostatic testing of the new storage tanks. If testing is to be conducted during the rainy season, the applicant anticipates that a biodegradable, environmentally safe dye would need to be added to the hydrotest water to allow for the visual discovery of leaks during wet conditions. Only one tank would be tested at a time, with the testing water pumped to each of the remaining tanks in succession as each test is completed. As a result, the volume of water used will be limited to the capacity of the largest tank, which in this case is 80,000 barrels (3.4 million gallons). Once testing of all tanks has been completed, the hydrotest water would be tested to confirm compliance with Ecology's discharge requirements. Special treatment of the hydrotest water prior to discharge is not expected but if it is found that the water exceeds discharge requirements, the water will be treated appropriately (e.g., filtering, pH adjustment) on site prior to discharge or shipped for offsite disposal if it cannot be handled on site. If no contamination issues are found, the dyed hydrotest water would be discharged to the harbor through the Port's stormwater system at a controlled rate to reduce the potential for erosion and increased turbidity around the outfall and to allow for dilution of the dyed water. Once diluted, the dye is not expected to affect the color of the river. Because these activities would occur during the construction period, they would be covered under the facility's NPDES Construction Stormwater General Permit and would be subject to the terms and conditions of that permit, including any applicable BMPs.

Operations

This section describes impacts that would occur as a result of routine operations at the project site, rail transport along the PS&P rail line, and vessel transport through Grays Harbor.

Onsite

Routine operation at the project site could affect Grays Harbor as the result of leaks or spills of various petrochemicals and other fluids used for facility operations and maintenance. For example, diesel fuel, oil, hydraulic fluid, or antifreeze would be used to operate and maintain vehicles and equipment. Additionally, operation of the bulk liquid transfer operations could result in leaks or spills of bulk liquids (e.g., crude oil) as the result of equipment failure or human error during unloading or loading activities. Other potential stormwater contaminants include vehicle residues (e.g., tire and brake dust) that accumulate in parking lots and material handling areas; airborne particulates from vehicle and vessel exhaust and facility emissions that are deposited on pavement

and other impervious surfaces of the facility; and residues of herbicides from areas where vegetation management (e.g., weed control in tank containment area) occurs. Oil spills, the potential impacts and risks, preventative measures and mitigation are described in Chapter 4, *Environmental Health and Safety.*

These chemicals could enter adjacent surface waters by transport in stormwater runoff. The potential for such substances to directly enter surface waters would be limited to equipment used on the Terminal 1 dock (e.g., loading arms) and its associated access ramp. Stormwater flowing across the facility during and after precipitation events could pick up contaminants from a variety of sources and carry these pollutants into Grays Harbor via the Port's stormwater conveyance system. The introduction of such substances to surface waters could degrade water quality and adversely affect both aquatic vegetation and aquatic life near the facility or transport these substances to other portions of Grays Harbor. The potential for these impacts to occur would be similar to but slightly greater than under the no-action alternative because of the increased impervious surface area and increased activity associated with the bulk liquid transfer facilities (e.g., crude oil unloading and loading). Any spills of oil or hazardous materials to water require notification and response as described in Chapter 4, *Environmental Health and Safety*. All oil or hazardous material spills must be reported by the spiller, who must respond appropriately. Under Washington Water Rights—Oil and Hazardous Substance Spill Prevention and Response law (Revised Code of Washington [RCW] 90.56.370), anyone responsible for spilling oil into state waters is liable for damages resulting from injuries to public resources, including plants. The process for determining damages for an oil spill is called a Natural Resource Damage Assessment, as defined in WAC 173-183.

Although spills or leaks could occur as the result of human error or minor equipment failure, the potential for these accidents to occur would be reduced by appropriate training and the implementation of prevention and control measures. This includes processes and procedures as described in the federally and state approved site-specific spill prevention, control, and countermeasures plan, facility response plan, and the oil spill prevention plan (which may be consolidated into an integrated contingency plan), which are discussed in greater detail in Chapter 4, *Environmental Health and Safety*. Specifically, prior to the commencement of bulk liquid loading operations at the facility, all personnel involved in liquid transfer operations would be trained in proper operating and spill prevention procedures. All pipelines and loading equipment would be regularly inspected for leaks and wear and promptly repaired if necessary. During loading operations, the dock would be constantly attended by the terminal operator who would have the ability to stop a transfer immediately if a leak or spill occurred from the dock or loading arm piping.

Additionally, as described in Chapter 2, *Proposed Action and Alternatives*, the containment areas underlying the rail unloading area and storage tanks are designed to contain accidental spills or leaks to reduce the conveyance of chemicals to waterways. Further, all stormwater discharges from the project site will be subject to the terms and conditions of a facility-specific NPDES Industrial Stormwater Discharge Permit. This permit will include requirements for the development, implementation, and maintenance of a stormwater pollution prevention plan, which will include BMPs to protect water quality; routine maintenance, inspection, and monitoring practices; and benchmarks for the pollutants in the facility's stormwater discharge.

The primary method of reducing stormwater runoff contamination on the facility will be the stormwater conveyance system. As with the applicant's current stormwater system, all precipitation that falls within the tank and rail containment areas will be routed to collection sumps where it will be visually inspected prior to being released to the Port's stormwater system. If contamination is

found, the stormwater will either be treated in place or pumped out by a certified wastewater hauler and taken to an appropriate treatment facility. All stormwater that leaves the facility via the Port's stormwater system, including runoff from all parking lots and other impervious surfaces, will also pass through an oil/water separator before being discharged to Grays Harbor, further reducing the potential of the release of contaminated stormwater. An oil/water separator is designed to separate oil from stormwater for normal operations and in the case of a spill, can contain small spills by isolating the spill run-off from the stormwater system. With these structures and the implementation of the stormwater BMPs to be required per the facility's NPDES permit contaminated stormwater would have a low impact on water resources.

Requirements for facility spill prevention and response is described in Chapter 4, *Environmental Health and Safety*. The potential for increased risks during onsite, rail, and vessel operations (e.g., storage tank failure, train derailment, or vessel collision) and the related environmental consequences (e.g., release of crude oil or other proposed bulk liquids) and any additional mitigation are also addressed in Chapter 4.

Rail

Operation of the proposed action at maximum throughput would add approximately two unit train trips per day on average (730 per year maximum)[8] compared to an average of three rail trips per day (1,235 per year) under the no-action alternative (Section 3.15, *Rail Traffic*). This increased rail traffic could affect water quality of surface waters and groundwater along the PS&P rail line as the result of incidental leaks and spills. An analysis of impacts from increased risk of accidents (e.g., train derailments) and related consequences (e.g., oil spills) is provided in Chapter 4, *Environmental Health and Safety.*

An increase in leaks and spills of petrochemicals used in routine rail operations could occur due to the increased frequency of rail traffic and maintenance, which would be slightly higher compared to the no-action alternative. Diesel fuel, oils, grease, and other fluids required for the operation and maintenance of railroad engines and rail cars could leak directly into surface waters and wetlands through the openings on bridges and trestles. Fuels could also be deposited onto the rail bed where they could be exposed to precipitation and storm flows that could carry them into adjacent surface waters and wetlands. Such discharges could degrade water quality and adversely affect aquatic vegetation, aquatic animals, birds, and wildlife in these and other downstream waterways. Sensitive areas that could be affected by such releases include the Chehalis River Surge Plain and the designated Critical Aquifer Recharge Area in the Black River and Scatter Creek subwatersheds in Thurston County. Most of these releases would be limited to minor drips and leaks whose potential can be reduced by regularly inspecting and maintaining railroad engines and rail cars and by implementing standard good housekeeping BMPs.

Vessel

Operation of the proposed action at maximum throughput would result in an average of approximately one tank vessel trip[9] per day (a maximum of 400 per year[10]) along the navigation

[9] A trip represents one-way travel.

[10] Proposed vessel trips are total for the facility so are not in addition to trips attributable to the applicant under the no-action alternative (approximately 14 per year).

channel compared to the 436 large commercial vessel[11] trips under the no-action alternative (Section 3.17, *Vessel Traffic*). This increased traffic and associated routine operation could result in water quality impacts related to ballast water discharge, propeller wash, and vessel wake. These impacts would be similar to but slightly greater compared with the no-action alternative. All spills of oil or hazardous materials from vessel operations are governed by Water Rights—Oil and Hazardous Substance Spill Prevention and Response (RCW 90.56.370), as described for onsite and rail operations.

Ballast Water

As described in Chapter 2, *Proposed Action and Alternatives*, tank vessels calling at the project site would likely discharge ballast water during the loading process. Ballast water discharge could contain a variety of materials that could harm surface waters. Primary among these contaminants are invasive marine plants and animals, bacteria, and pathogens that could displace native populations and harm aquatic life (Sections 3.4, *Plants*, and 3.5, *Animals*). This contaminated water could be discharged into Grays Harbor during loading where it could degrade water quality and harm aquatic organisms.

Under federal regulations (*Nuisance Prevention and Control Act of 1990*, as amended by the *National Invasive Species Act of 1996* 16 U.S.C. 4711 et seq.), crude oil tankers engaged in coastwise trade would be exempt from requirements to install and operate U.S. Coast Guard approved ballast water management systems and are not required to conduct mid-oceanic exchanges of ballast water. However, the Washington Department of Fish and Wildlife is responsible for implementing ballast water regulations under Revised Code of Washington (RCW) 77.120, Ballast Water Management Law. According to RCW 77.120.030, discharge of ballast water into waters of the state is not allowed unless there has been an open sea exchange, or if the vessel has treated its ballast water to meet state and federal standards. Vessels voyaging to Washington State from a port in Puget Sound or the Columbia River do not have to conduct an open sea exchange if the ballast water is from these waters. Under the proposed action, all tanks vessels, including tank barges, must file a ballast water reporting form to Washington Department of Fish and Wildlife 24 hours before entering Washington State waters.

A review of the ballast water delivery and management data compiled by the National Ballast Information Clearinghouse indicates that of the 66 tank vessels that operated in Grays Harbor during the past 7 years, all of those that discharged ballast water in the harbor had previously performed an open-sea exchange prior to entering the harbor (National Ballast Information Clearinghouse 2014). However, a number of studies has shown that mid-ocean ballast water exchanges are only partially effective (Verling et al. 2005; Minton et al. 2005; Ruiz and Smith 2005; Cordell et al. 2015). The increase in the number of vessels related to the proposed action (a maximum of 200 per year) would increase the risk of introducing invasive aquatic plans and other organisms. Potential impacts on plants and animals are addressed in Section 3.4, *Plants*, and 3.5, *Animals*.

Propeller Wash and Vessel Wake

As noted in Section 3.1, *Earth*, operation of the proposed action could increase the potential for erosion within and along the harbor related to increased vessel traffic. The location and extent of

[11] The term *large commercial vessels* refers collectively to tank and cargo vessels.

these impacts would depend on a variety of factors, including climatic conditions, tidal conditions, vessel type, vessel location, and vessel speeds. There would be an incremental increase in the potential for impacts associated with wake compared with the no-action alternative, because operation of the proposed action would result in additional tank vessel trips in the harbor.

Overall, any water quality impacts caused by propeller wash and vessel wake would likely be short-term. Both Terminal 1 and the Cow Point Turning Basin are located in a portion of Grays Harbor that has a high existing baseline for turbidity (Federal Highway Administration and Washington Department of Transportation 2010:3.1–3-3). Consequently, vessel operations under the proposed action are not expected to increase turbidity levels substantially above existing conditions.

3.3.6 What required permits and plans apply to water?

The following permit conditions and required plans are expected to reduce impacts on water.

- City of Hoquiam and City of Aberdeen Critical Areas Review for fish and wildlife habitat and geologically hazardous areas
  - Critical area review report
  - Buffer establishment and protection requirements
  - Buffer mitigation and monitoring requirements
  - Buffer activity limits and restrictions
- City of Hoquiam and City of Aberdeen Shoreline Substantial Development Permits
- City of Hoquiam Conditional Land Use Permit
- City of Hoquiam and City of Aberdeen Building Permits
- City of Hoquiam and City of Aberdeen Grade and Fill Permits
- Washington State Department of Ecology National Pollutant Discharge Elimination System Construction Stormwater General Permit
  - Discharge/effluent limit requirements
  - Monitoring, sampling and reporting requirements
  - Onsite spill control material provision requirements
  - Stormwater pollution prevention plan preparation requirement
  - Stormwater BMP development and implementation
- Washington State Department of Ecology National Pollutant Discharge Elimination System Industrial Stormwater Permit
  - Discharge/effluent limit requirements
  - Monitoring, sampling, and reporting requirements
  - Operations and maintenance plan
  - Stormwater pollution prevention plan
  - Onsite spill control material provision requirements

  - Spill Prevention Control and Countermeasures Plan preparation requirement
  - Industrial discharge BMP development and implementation
- Integrated Contingency Plan to satisfy federal and state oil spill prevention and contingency planning and facility operations requirements
  - Evaluation of onsite safety and health hazards
  - Pre-emergency planning and coordination with outside organizations
  - Roles and responsibilities in an emergency
  - Evacuation routes and emergency alert and response protocols
  - Oil and hazardous material transfer operation protocols
  - Containment and countermeasures to prevent oil spills from entering navigable waterways
  - Notification procedures
  - Spill mitigation procedures
  - Facility response activities
  - Training and exercise procedures
  - Equipment descriptions: emergency shutdown system, containment, fire fighting

3.3.7 What mitigation measures would reduce impacts on water?

This section describes voluntary measures, design features, and applicant mitigation that would reduce impacts on water from construction and routine operation of the proposed action.

3.3.7.1 Voluntary Measures and Design Features

The proposed action does not include any voluntary measures or design features that would reduce potential impacts on water.

3.3.7.2 Applicant Mitigation

With implementation of the permit conditions and required plans described above, impacts resulting from the proposed action are considered low and would not necessitate mitigation.

3.3.8 Would the proposed action have unavoidable and significant adverse impacts on water?

Compliance with the applicable regulations and permits described above would reduce impacts on water. There would be no unavoidable and significant adverse impacts. Potential impacts related to spills are addressed in Chapter 4, *Environmental Health and Safety*.

3.4 Plants

Plants are the foundation of most aquatic and terrestrial ecosystems. Among other functions, plants release oxygen and sequester carbon, provide wildlife habitat and food, affect soil development, and can increase slope stability. Plants are also involved in the regulation of biogeochemical cycles such as the movement and filtration of water, carbon, and nitrogen. Plants can also have cultural, spiritual, and psychological benefits for humans.

This section describes plants in the study area, including high-quality vegetation and special-status species. It then describes impacts on plants that could result under the no-action alternative or as a result of the construction and routine operation[1] of the proposed action. Finally, the section presents any measures identified to mitigate impacts of the proposed action and any remaining unavoidable and significant adverse impacts.

3.4.1 What is the study area for plants?

The study area for plants consists of plants on and near the project site that could be affected during construction and routine operations at the project site. The study area also includes plants that could be affected during rail transport along the Puget Sound & Pacific Railroad (PS&P)[2] rail line and vessel transport through Grays Harbor out to 3 nautical miles from the mouth of the harbor.

3.4.2 What laws and regulations apply to plants?

Laws and regulations for determining potential impacts on plants are summarized in Table 3.4-1. More information about these laws and regulations is provided in Appendix B, *Laws and Regulations*.

[1] Chapter 4, *Environmental Health and Safety*, addresses the potential impacts from increased risk of accidents (e.g., storage tank failure, train derailments, vessel collisions) and related consequences (e.g., release of crude oil or other proposed bulk liquids).

[2] The PS&P rail line refers to the rail line between Centralia and the project site.

Table 3.4-1. Laws and Regulations for Plants

Laws and Regulations	Description
Federal	
Clean Water Act, Section 301 (33 U.S.C. 1251 et seq.)	Prohibits the discharge of any pollutant to a water of the United States without a permit.
Clean Water Act, Section 401 (33 U.S.C. 1251 et seq.)	Ensures that projects within the waters of the United States comply with water quality and related aquatic resource protection requirements.
Clean Water Act, Section 402 (33 U.S.C. 1251 et seq.)	Establishes the NPDES permitting program, under which discharges of pollutants are regulated.
Endangered Species Act (16 U.S.C. 1531 et seq.)	Established with the intent of providing protections for imperiled species and the ecosystems upon which they depend.
State	
Natural Area Preserves Act (RCW 79.70)	Establishes a framework for identifying and cataloging special-status plant species and regionally important or unique plant communities in Washington State.
Noxious Weed Law (RCW 17.10) and Noxious Weed List and Schedule of Monetary Penalties (WAC 16-750)	Establishes the list of noxious weeds within classes that reflect the level of concern and are related to specific mandatory control and prevention measures that are required for managing the spread of those weeds.
Growth Management Act (RCW 36.70Aand WAC 365-190-080–180)	Requires the counties and cities of the state to prepare and adopt comprehensive plans that keep with the Growth Management Act planning goals. Identifies critical areas of Washington State and establishes minimum regulatory standards for local governments to implement.
Water Pollution Control (RCW 90.48)	Regulates the discharge of pollutants into waters of the state, including streams, lakes, rivers, ponds, inland waters, salt waters, watercourses, and other surface and underground waters.
Water Rights—Oil and Hazardous Substance Spill Prevention and Response "Oil Spill Act" (RCW 90.56)	Provides a simplified process to calculate damages from an oil spill and holds responsible parties liable for damages resulting from injuries to public resources.
Oil Spill Natural Resources Damage Assessment (WAC 173-183)	Establishes procedures for convening a resource damage assessment committee, preassessment screening of damages, and selecting the damage assessment methodology.
Local	
Critical Areas Ordinance (HMC 11.06 and AMC 14.100)	Sets forth the definitions and process for designating and protecting critical areas within the city limits of Hoquiam and Aberdeen, respectively.
Hoquiam: Landscaping and Screening Ordinance (HMC 10.05.65)	Requires that 18 inches total caliper of new trees be planted per gross acre of new development.

U.S.C. = United States Code; NPDES = National Pollutant Discharge Elimination System; RCW = Revised Code of Washington; WAC = Washington Administrative Code; HMC = Hoquiam Municipal Code; AMC = Aberdeen Municipal Code

3.4.3 How were impacts on plants evaluated?

This section describes the sources of information and methods used to evaluate impacts.

3.4.3.1 Information Sources

Washington Natural Heritage Program (WNHP) manages the state's only comprehensive database of rare plant species and high-quality native plant communities. WNHP's 2014 global information system (GIS) data, as well as information from the WNHP's online Reference Desk, were used to determine known occurrences of special-status plant species and high-quality native plant communities (including their characteristic plant species) in the study area. A list of special-status plant species for Grays Harbor, Lewis, and Thurston Counties was also generated from the iPAC online system (U.S. Fish and Wildlife Service 2014a).

Special-status plant species are those species regulated by the U.S. Fish and Wildlife Service (USFWS) as threatened, endangered, sensitive, or candidate species under the Endangered Species Act (ESA), and plant species regulated or tracked by the Washington State Department of Natural Resources as state threatened, endangered, or sensitive.

Terrestrial plant communities were characterized using aerial photographs available through GoogleEarth and the 2011 National Land Cover Dataset (Multi-Resolution Land Characteristics Consortium 2014), as well as information gathered from references cited herein. Plants in the study area were characterized during a reconnaissance-level visit conducted in September 2014 at the project site and vicinity, Grays Harbor NWR, and along publicly accessible portions of the PS&P rail line corridor near Hoquiam.

3.4.3.2 Impact Analysis

Impacts on vegetation at the project site were determined by examining the vegetation relative to proposed construction plans. Impacts on vegetation within 0.5 mile of the PS&P rail line and both in and within 0.5 mile of Grays Harbor were qualitatively assessed using the information sources described above.

3.4.4 What plants are in the study area?

This section describes plants in the study area that could be affected by construction and routine operation of the proposed action. This section provides the general context for plants in the study area and describes plants at the project site and plant communities along the PS&P rail line and in and along the shoreline of Grays Harbor, including possible resources out to 3 nautical miles from the mouth of Grays Harbor.

The study area is in the Northwest Coast ecoregion. This region is characterized by a temperate climate with summer fog and generally cool temperatures, particularly along the coastline and adjacent estuaries, such as Grays Harbor and river valleys such as the Chehalis River (Washington State Department of Natural Resources 2007; Franklin and Dyrness 1973).

Undeveloped lowland areas in this ecoregion are typically coniferous forests, characterized by western hemlock (*Tsuga heterophylla*), Douglas-fir (*Pseudotsuga menziesii*), and western red cedar (*Thuja plicata*) as the dominant tree species. Sitka spruce (*Picea sitchensis*) is also a dominant tree in the lowlands adjacent to the coastline and in areas immediately surrounding Grays Harbor (Washington State Department of Natural Resources 2007; Franklin and Dyrness 1973). Undeveloped lowland floodplains and forested wetlands in this ecoregion (as described in Section 3.3, *Water*) are typically characterized by deciduous and mixed forest communities

dominated by red alder (*Alnus rubra*), western red cedar, Sitka spruce, black cottonwood (*Populus balsamifera*), and willow (*Salix* spp.) trees.

Relative to special-status species, five of the six plants listed under the ESA have been documented in Grays Harbor, Thurston, and Lewis Counties (Washington Natural Heritage Program 2014a).

- Marsh sandwort (*Arenaria paludicola*): historically documented in Grays Harbor County
- Golden Paintbrush (*Castilleja levisecta*): documented in Thurston County
- Water howellia (*Howellia aquatilis*): documented in Thurston County
- Kincaid's lupine (*Lupinus sulphureus* ssp.*kincaidii*): documented in Lewis County
- Nelson's checker-mallow (*Sidalcea nelsoniana*): documented in Lewis County

However, the WNHP database contains no records of these ESA-listed plant species having been documented in the portions of these counties in the study area (Washington Natural Heritage Program 2014b).

3.4.4.1 Project Site

The project site does not support a native vegetation community. The land on which the project site is located was created as a result of the former boat slip #1 being filled with dredge material between the 1980s and 1990s (GeoEngineers 2013:1). Wood debris is also present within the fill. The southeastern half of the project site is paved, developed and lacks any landscaping.

The 10.9-acre unpaved portion of the project site exists around the northern and western sides of the project site. The northwestern half of the site was filled in 2011 and this compacted soil area is now characterized by a sparse cover of various grasses and early successional/weedy plant species. Species observed growing on the fill material included herbaceous species such as Canada thistle (*Cirsium arvense),* bull thistle *(Cirsium vulgare),* curly dock *(Rumex crispus),* common horsetail *(Equisetum arvense),* Queen Anne's lace *(Daucus carota),* and Japanese knotweed (*Polygonum cuspidatum)*. Himalayan blackberry (*Rubus armeniacus*) and Scot's broom (*Cytisus scoparius)* and black cottonwood seedlings *(Populus balsamifera)* have been noted along Fry Creek.

Scattered plants generally associated with moist surface conditions, such as common rush (*Juncus effusus),* saltgrass *(Distichlis spicata)*, reed canarygrass (*Phalaris arundinacea*), and common brass buttons (*Cotula coronopifolia)* were noted in the undeveloped area proposed for expansion during the wetlands survey (Parametrix 2013:2).

The industrialized shoreline along Terminal 1, including the shoreline adjacent to the project site, is heavily rocked or riprapped and thus lacks the intertidal marsh communities that characterize the undeveloped portions of the Grays Harbor shoreline. Scattered beach logs are lodged on top of the riprap along the approximate elevation of mean higher high water (MHHW). Blackberry canes are interspersed with the riprap and beach logs above MHHW.

The WNHP database contains no records of any federal or state special-status plant species having been documented at the project site. The nearest documented current occurrence[3] of a special-

[3] The WNHP database defines a current occurrence as an occurrence in which the most recent record was after 1977. Species for which the most current occurrence was prior to 1977 are considered historic occurrences.

status plant is approximately 7 miles to the west-northwest of the project site along the shoreline of Grays Harbor (Washington Natural Heritage Program 2014b).

3.4.4.2 PS&P Rail Line

Four special-status plant species have been recorded in the WNHP database within the 0.5-mile study area along the PS&P rail line (Washington Natural Heritage Program 2014b).

- Four 1991 occurrences of the white-topped aster (*Sericocarpus rigidus;* USFWS Species of Concern, WNHP Sensitive), in four locations along the north side of the PS&P rail line near Rochester and to the east of Scatter Creek. Two of these occurrences are recorded as adjacent to the rail line.
- A 1995 occurrence of tall bugbane (*Cimicifuga elata;* USFWS Species of Concern, WNHP Sensitive), approximately 1 mile southeast of the PS&P rail yard in Centralia.
- A 1997 occurrence of the western wahoo (*Euonymus occidentalis var. occidentalis;* WNHP Sensitive), along the south side of the PS&P rail line near Rochester.
- Eight 2007 occurrences of the small-flowered trillium (*Trillium parviflorum;* WNHP Sensitive). Six of these are recorded 1.5 to 2.5 miles northwest of the Centralia PS&P rail yard (three of which are recorded near the rail line itself) and two occurrences are recorded to the north of the PS&P rail line near US Route 2 (US 2) and Prairie Creek.

Six general types of terrestrial vegetation communities occur along the PS&P rail line based on the 2011 National Land Cover Data Set (Multi-Resolution Land Characteristics Consortium 2014).

Coniferous, Deciduous, and Mixed Forests

Much of the area along the PS&P rail line between approximately Malone-Porter and Oakville is a mixture of coniferous, deciduous, and mixed forests characteristic of the broader region. These forests are generally dominated by Douglas-fir, western red cedar, Sitka spruce, red alder, and black cottonwood trees with an understory that varies depending on the type of overstory vegetation and local soil and moisture conditions. Forested wetlands also occur along the PS&P rail line in areas hydrologically influenced by the Chehalis River and its tributaries and in areas influenced by high groundwater conditions. Wetlands are described in more detail in Section 3.3, *Water*.

Shrub-Scrub Vegetation

Some areas along the PS&P rail line, including northwest of Malone-Porter, are characterized by a shrub-scrub vegetation community. Shrub-scrub areas are generally dominated by a dense mixture of young trees and shrubs less than 20 feet tall, intermixed with multiple-stemmed small trees, such as willows. Recently harvested timberlands are also frequently characterized as shrub-scrub while they are in the early stages of revegetating after trees have been harvested. Scrub-shrub wetlands also occur along the PS&P rail line in areas hydrologically influenced by the Chehalis River and its tributaries and in areas influenced by high groundwater conditions. Wetlands are described in more detail in Section 3.3, *Water*.

Herbaceous Vegetation

Small, generally scattered areas along the PS&P rail line are characterized as herbaceous (i.e., non-woody) vegetation. These areas are typically low-lying areas dominated by grasses such as invasive,

but well-established, reed canarygrass (*Phalaris arundinacea*) and emergent wetlands associated with the floodplain of the Chehalis River, as described in more detail in Section 3.3, *Water*.

Cultivated Crops

Some areas along the PS&P rail line, including areas south of the rail line between Centralia and Oakville and west of Malone-Porter, are cultivated as cropland. These areas are generally in or near the Chehalis River floodplain and typically no longer support a native plant community.

Hay and Pasture Land

Several areas along the PS&P rail line, including south of the rail line between Grand Mound and Oakville and between Malone-Porter and Montesano, are characterized as hay or pasture. These areas are also in or near the Chehalis River floodplain and typically no longer support a native plant community. They are dominated by herbaceous vegetation, a mixture of grasses palatable to cattle, horses, and sheep.

Developed Land

The urbanized areas associated with the Cities and Towns of Centralia, Fords Prairie, Grand Mound, Rochester, Chehalis Village, Oakville, Elma, Satsop, Brady, Montesano, Central Park, Cosmopolis, Aberdeen, and Hoquiam are characterized as developed. These areas generally support a mixture of nonnative and native plants, typically associated with residential and commercial landscaping, public open spaces (such as parks), and small extents of otherwise protected sensitive areas (such as floodplain wetlands) that lie within the cities' urbanized areas but are too small to be mapped separately.

3.4.4.3 Grays Harbor

The WNHP database includes one historically documented special-status plant along the Grays Harbor shoreline near Pt. New and Brackenridge Bluff: a 1982 occurrence of the pink fawn-lily (*Erythronium revolutum*), a plant species classified by the WNHP as Sensitive (Washington Natural Heritage Program 2014b).

Several types of high-quality aquatic and intertidal vegetation communities occur in and along the Grays Harbor shoreline. Eelgrass, macroalgae, salt marshes, and dunegrass, as well as low-elevation freshwater wetlands and tidal surge plain wetlands, are present in the study area along the Grays Harbor shoreline. These vegetation communities provide habitat for a variety of fish, shellfish, benthic invertebrates, shorebirds, and other wildlife that use the study area and are critical elements of both primary production and the benthic/detrital foodweb of the estuary.

The portion of the study area that extends 3 nautical miles into the Pacific Ocean from the mouth of Grays Harbor is characterized by shifting sands and other soft sediments, which are influenced by the Bar Channel and South Jetty Reaches of the Grays Harbor Navigation Channel. These features concentrate flows into and out of Grays Harbor and create an environment that is generally not conducive to the establishment of plants. However, kelp, a group of large seaweeds in the Order *Laminariales*, occurs along the Pacific coast of Washington (as well as in Puget Sound), and has been documented near the mouth of Grays Harbor (Washington State Department of Natural Resources 2001).

Aquatic Vegetation

Grays Harbor supports vast areas of intertidal mudflats that support native eelgrass (*Zostera marina*) and both high-and low-elevation intertidal salt marshes, as well as scattered areas of rocky substrate that support a variety of macroalgae and nonfloating kelp species. These vegetation communities create patches of intertidal and shallow subtidal habitat that are important to a variety of wildlife species, including juvenile salmonids, Dungeness crabs, and migratory shorebirds. Per Washington Administrative Code (WAC) 220.110.250(3)(a,b), eelgrass, macroalgae, and kelp are defined as saltwater habitats of special concern. According to WAC 365-190-130, kelp and eelgrass beds are critical saltwater habitat for forage fish spawning areas.

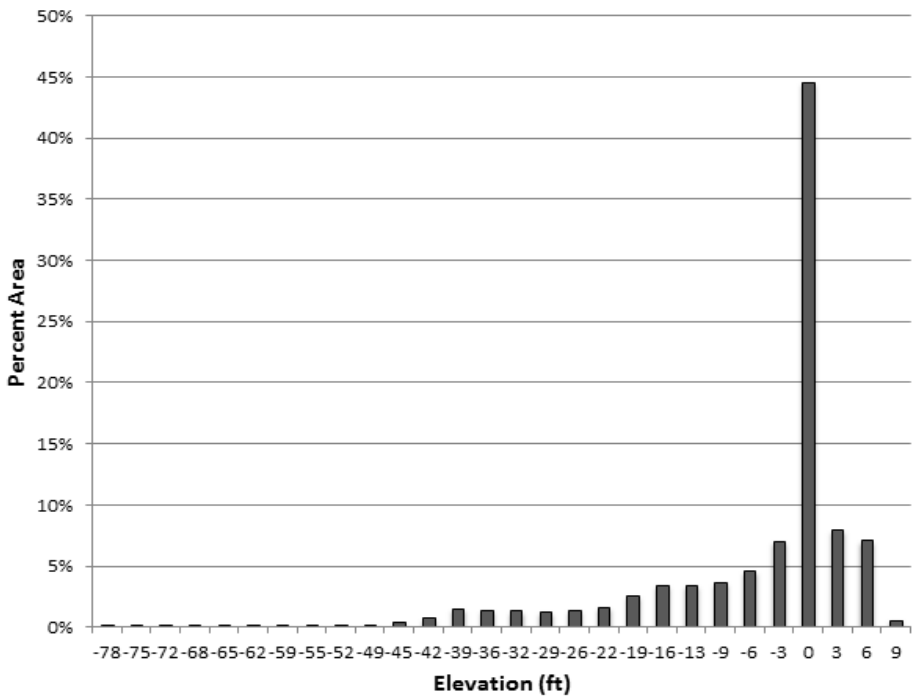
Eelgrass

Eelgrass beds support the thousands of ducks and geese that winter in Grays Harbor, and the vast numbers of shorebirds that stop in Grays Harbor to rest and feed during their annual spring migration to artic breeding grounds (U.S. Fish and Wildlife Service 2014b). Eelgrass flourishes in shallow, sunlit environments with unconsolidated substrate that are protected from strong currents and heavy, repeated wave action. Eelgrass prefers currents less than 3.5 knots, depths less than 22 feet, and salinity greater than or equal to 20 parts per thousand (Phillips 1984:14).

These environmental parameters (i.e., current speed, water depth, salinity, and low turbidity) are not found in the navigation channel, along the shoreline, or in the immediate vicinity of the project site. The landscape that drains to the Chehalis River is high in clay content and, as such, the Chehalis River is highly turbid with suspended sediments. Turbidity levels in the waters of the inner harbor near the project site and at the mouth of the Chehalis River tend to fluctuate, particularly near the middle and bottom of the water column. Turbidity ranging from 3 to 233 nephelometric turbidity units was documented during water quality sampling conducted in January 2008 (U.S. Army Corps of Engineers 2008:6). The shoreline of the inner harbor and the shoreline adjacent to the project site do not support eelgrass (ICF Jones & Stokes 2009:4-1–4-4).

As the turbid waters of the Chehalis River are diluted farther from the river mouth, the increased water clarity creates conditions for eelgrass to grow where substrate, current, and elevation conditions are appropriate. Geospatial analysis conducted in 2003 found an increase in potential eelgrass habitat (based on elevation) in Grays Harbor of approximately 4,430 acres compared to historic (1883) conditions. At least 7,605 acres of Grays Harbor were estimated to lie at elevations found suitable for eelgrass meadows (i.e., between 0 feet and 3.9 feet mean lower low water) (Borde et. al. 2003:1109). Similarly, bathymetric analysis of Grays Harbor indicates that nearly 60% of the harbor (approximately 15,000 acres) is between −6 feet and +3 feet elevation, elevations that typically support eelgrass (Figure 3.4-1).

Figure 3.4-1. Percentage of Grays Harbor Estuary by Elevation



Macroalgae

Because most of Grays Harbor is unconsolidated sand and mud, macroalgae distribution is limited to rocked shoreline areas and the rocked surface of the jetties where macroalgae can find hard substrates for attachment. Low densities of leafy green sea lettuce (*Ulva lactuca*), rockweed (*Fucus distichus*), and green gut weed (*Enteromorpha intestinalis*) have been found distributed sparsely in the inner margins of the harbor near the project site close to Cow Point. Small amounts of sea lettuce and rockweed were also found attached to derelict pilings and on boulder riprap armoring the shoreline (ICF Jones & Stokes 2009:4-1–4-4).

Salt Marsh and Dunegrass

Salt marshes are essential elements of the estuarine landscape and represent an important intertidal component of the aquatic vegetation community in the Grays Harbor estuary. They provide habitat for a variety of fish, bird, and other animal species and are sources of both primary production and benthic foodweb support for the larger estuarine system (Seliskar and Gallagher 1983:37–41). Historically, this type of marsh extended many miles upstream of the estuary, becoming progressively dominated by freshwater species at the upper extent of tidal influence.

Salt marsh plants are generally categorized by their elevational range as low-marsh or high-marsh species. Species such as seaside arrowgrass (*Triglochin maritima*) and pickleweed (*Salicornia virginica*) are generally characterized as low-marsh species, and species such as Baltic rush (*Juncus balticus*), tufted hairgrass (*Descampsia cespitosa*) and Lyngby's sedge (*Carex lynbyei*) are generally characterized as high-marsh species (Seliskar and Gallagher 1983:17–19). Both low-marsh and high-marsh habitats provide important resting and foraging habitat for migrating birds and rearing

juvenile fishes. They also contribute to the benthic productivity of the system by seasonally contributing large amounts of organic material as their leaves and stems die back in the winter.

Although diking of intertidal areas has transformed many areas of salt marsh into wet pasturelands removed from tidal influence, Grays Harbor retains large areas of intact native salt marshes in the Grays Harbor National Wildlife refuge. The harbor also has numerous high-quality salt marshes documented in the WNHP database along the northern shoreline of Grays Harbor, including along the shorelines of the North Bay, of the South Bay near the mouth of the Elk River, and at the mouth of the Johns River (Figure 3.4-2) (Washington Natural Heritage Program 2014b; Northwest Area Committee 2013:6-3–6-8). These marshes are characterized by high quality, characteristic native salt marsh communities dominated by Baltic rush, seaside arrowgrass, pickleweed, tufted hairgrass, and Lyngby's sedge.

Salt marsh is also present along the shoreline of Rennie Island, approximately 1,500 feet to the southwest across the navigation channel from the project site. As described in Section 3.3, *Water*, Rennie Island is surrounded by a band of tidally exposed mudflats and salt marsh, and supports tidally influenced forested and scrub-shrub wetlands. The interior of the island also contains emergent wetlands and open water areas that are remnants of the now defunct ITT Rayonier pulp mill effluent pond.

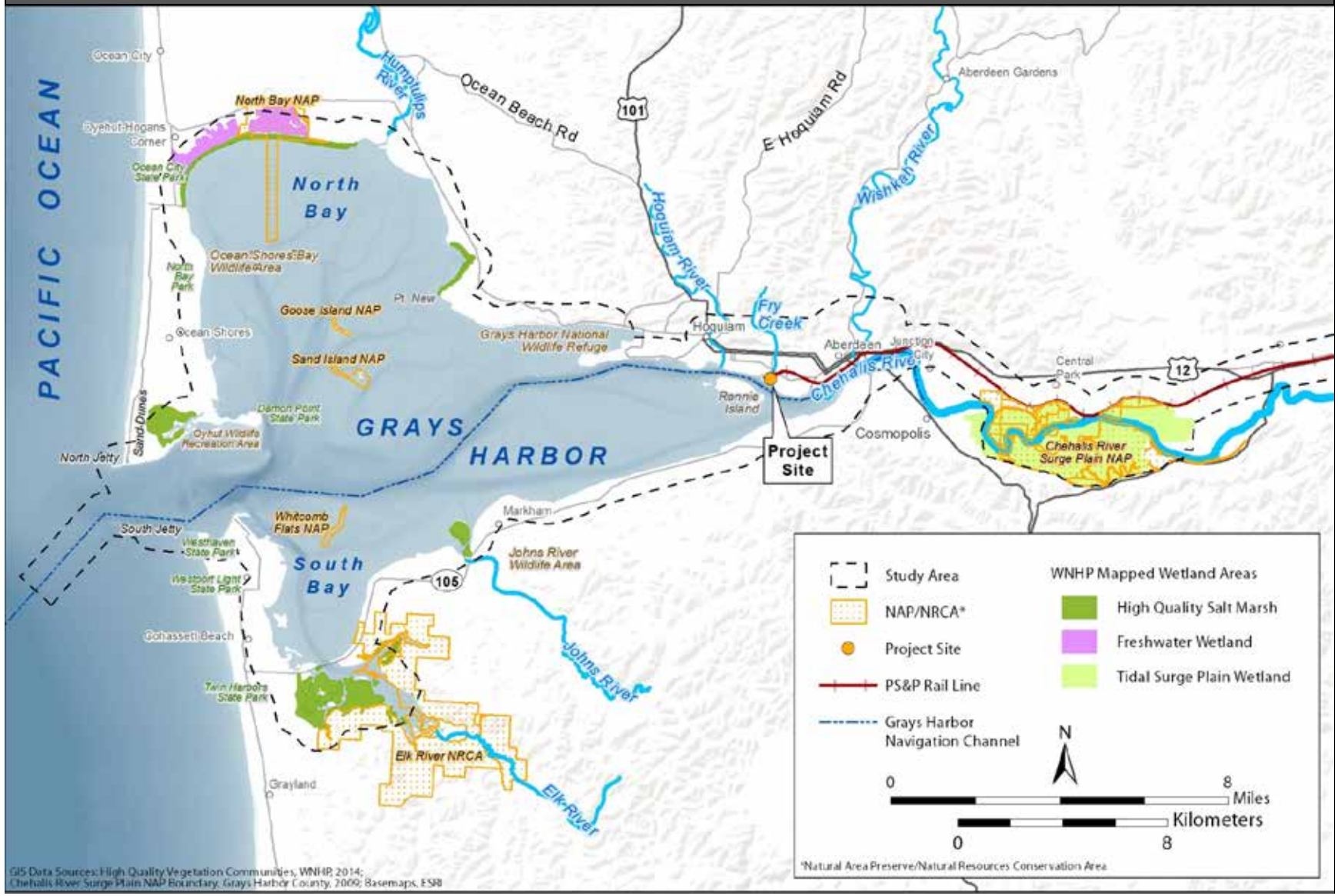
Native dunegrass (*Elymus mollis*) and the introduced European beach grass (*Ammophila arenaria*) occur on sand dunes above MHHW upslope of the South Jetty and Half Moon Bay, where they stabilize the sand dunes and provide nesting habitat for some species of shorebirds, and foraging habitat and shelter for a variety of wildlife. Dunegrass in the Damon Point area provides one of three critical nesting habitat areas for the snowy plover (*Charadrius alexandrius nivosus)*, a federally listed shorebird (Northwest Area Committee 2013:6-3–6-8).

Kelp

Twenty-six species of kelp occur along Washington's shorelines; they are categorized as *floating* or *nonfloating*. Floating kelp species include the familiar bull kelp (*Nereocystis luetkeana*) and giant kelp (*Macrocystis integrifolia*) that form the offshore kelp forests common in rocky, high-energy environments (Mumford 2007). The soft sediments and relatively low-energy waters of Grays Harbor do not support floating kelp forests (Washington State Department of Natural Resources 2001).

Nonfloating kelp, of which 21 species are found in Washington waters, are widely distributed along the northern Pacific coast and the waters of Puget Sound. Approximately 6% of Gray Harbor County's shoreline supports nonfloating kelp (Mumford 2007). Nonfloating kelp species require some solid substrate for growth, but can anchor on rocks as small as pebbles; they tend to grow in areas of high to moderate wave energy or currents. Nonfloating kelp has been documented in Grays Harbor, on the intertidal and shallow subtidal areas of the South Bay/Whitcomb Flats (Mumford 2007; Washington State Department of Natural Resources 2015).

Figure 3.4-2. High-Quality Vegetation Communities in and along the Shoreline of Grays Harbor



Low-Elevation Freshwater Wetlands

The north shore of Grays Harbor also supports a high quality, low-elevation wetland community dominated by species associated with acidic soils and bog-like conditions (Figure 3.4-2). This plant community is dominated by shrubby areas of Labrador tea (*Ledum groenlandicum*), sweetgale (*Myrica gale*), *Sphagnum* moss, and skunk cabbage (*Lysichiton americanum*), interspersed with forested areas of western red cedar, shore pine (*Pinus contorta*), and Sitka spruce trees (Washington Natural Heritage Program 2014b).

Low-elevation freshwater wetlands also support numerous plants that are culturally important for Native American inhabitants of Grays Harbor such as several species of trees and shrubs (e.g., vine maple (*Acer circinatum*), Sitka spruce, western red cedar, willows, rushes and reeds (e.g., species in the genus *Juncus*, *Scirpus*, and *Schoenoplectus*) and cattail (*Typha latifolia*), which were used in basket making (James and Martino 1986:76–83).

Grays Harbor Protected Areas

Grays Harbor National Wildlife Refuge

The Grays Harbor National Wildlife Refuge is located approximately 3 miles west of the project site (Figure 3.4-2) and managed by USFWS. As described in Section 3.5, *Animals*, the refuge was developed to preserve 1,500 acres of high-quality native terrestrial and intertidal communities, as well as crucial habitat foraging and resting habitat for migratory shorebirds, raptors, and waterfowl (U.S. Fish and Wildlife Service 2014b). Native terrestrial plants such as red alder, salmonberry (*Rubus spectabilis*) and red elderberry (*Sambucus racemosa*) present along the higher elevation portions of the refuge provide habitat for terrestrial animals such as neotropical[4] songbirds, raptors, and resident mammals such as black–tailed deer (U.S. Fish and Wildlife Service 2014b).

Native aquatic vegetation communities protected in the Grays Harbor National Wildlife refuge include high-quality low and high marshes dominated by salt marsh species such as pickleweed (*Salicornia virginica*), Lyngby's sedge (*Carex lyngbyei*), and coastal saltgrass (*Distichlis spicata*) (Washington Natural Heritage Program 2014b; U.S. Fish and Wildlife Service 2014b).

In addition, basket grass, also known as American or common three-square or chair-maker's rush (*Schoenoplectus pungens* [formerly classified as *Scirpus americanus*]), is a common, relatively tall sedge. It is a culturally important plant for regional basket makers of the Chehalis, Quileute, Hoh, Quinault, and Makah Tribes, as well as basket makers of several Puget Sound tribes (Natural Resources Conservation Service 2000; James and Martino 1986:71–76). Sweet grass grows in either freshwater or brackish marshes on the flats of the intertidal zone and exists in the area along the shoreline of Bowerman Basin in the Grays Harbor National Wildlife Refuge, where it has been harvested for generations by Native American inhabitants of Grays Harbor (Natural Resources Conservation Service 2000; James and Martino 1986:71–76).

Johns River Wildlife Unit

The 6,700-acre Johns River Wildlife Unit is composed of 15 separate units, each managed to protect or restore particular estuarine and wetland habitats.

[4] *Neotropical* is a common term for songbirds that migrate between the tropics and North America.

The 683-acre Oyhut Wildlife Recreation Area and adjacent Damon Point are located at the south end of the Ocean Shores Peninsula at the mouth of Grays Harbor (Figure 3.4-2) (Washington Department of Fish and Wildlife 2014). High-quality salt marsh plant communities characterized by pickleweed and coastal saltgrass, as well as associated mudflats that are protected in this area (Washington Natural Heritage Program 2014b). Sand dune habitats protected in this area support one of only four remaining nesting areas for snowy plovers in Washington State (Section 3.5, *Animals*).

The 63-acre South Grays Harbor unit along the south shore of Grays Harbor is managed to protect shoreline and estuarine habitats. Inclusion of an additional 800 acres is pending.

The 1,500-acre Johns River Wildlife Area, also along the south shore of Grays Harbor, is managed for waterfowl habitat and hunting and protects areas of high-quality low marsh, dominated by seaside arrowgrass (*Triglochin maritima*) and pickleweed (Figure 3.4-2) (Washington Natural Heritage Program 2014b). This area also protects a high-quality western red cedar swamp (Washington Department of Fish and Wildlife 2014).

The 41-acre Elk River unit, located at the mouth of the Elk River at the southwestern corner of Grays Harbor, protects estuary, tide flat and salt marsh habitats, including extensive areas of high-quality low and high marsh dominated by Baltic rush, coastal saltgrass, tufted hairgrass, and Lyngby's sedge (Figure3.4-2) (Washington Natural Heritage Program 2014b).

Chehalis River Surge Plain Natural Area Preserve

The Chehalis River Surge Plain Natural Area Preserve is located just upstream of Cosmopolis near the downstream end of the Chehalis River approximately between river miles 3.8 and 10.8 (Figure 3.4-2). The Washington State Department of Natural Resources manages approximately 2,345 acres to protect the largest and highest quality Sitka spruce-dominated coastal surge plain wetland in Washington State. There are only four other known wetlands of this type in Washington, all smaller and in poorer ecological condition (Washington State Department of Natural Resources 2009).

The plant community in the Chehalis River Surge Plain Natural Area Preserve is characterized by WNHP as a high-quality/rare plant community (Washington Natural Heritage Program 2014c). The forested areas are characterized by deep, organic alluvium soils over clay and are dominated by Sitka spruce trees. Mature trees in the preserve range from about 50 to more than 200 years old. The forested areas are also dominated by red alder and western red cedar trees, with a dense understory of red-osier dogwood (*Cornus sericea*), salmonberry, slough sedge (*Carex obnupta*) and skunk cabbage (*Lysichiton americanum*). Shrub-scrub areas are characterized by a mixture of red-osier dogwood and willow trees, interspersed with dense patches of Douglas spirea (*Spiraea douglasii*); lady-fern (*Athyrium filix-femina*) and skunk cabbage dominate the herbaceous layer. Mixed herbaceous areas are characterized by species such as soft-stem bulrush (*Schoenoplectus tabernaemontani*), small-fruited bulrush (*Scirpus microcarpus*), Lyngby's sedge, and common cattail. Lyngby's sedge forms vast swaths of native intertidal marsh along the low banks of the river and sloughs (Washington State Department of Natural Resources 2009; Washington Natural Heritage Program 2014b).

3.4.5 What are the potential impacts on plants?

This section describes impacts on plants that could occur in the study area. Potential impacts of the no-action alternative are described first, followed by potential impacts of the proposed action.

3.4.5.1 No-Action Alternative

Under the no-action alternative, the applicant would continue to operate its existing facility as described in Chapter 2, Section 2.1.2.2, *Existing Operations*. Impacts on water quality that could affect vegetation would continue similar to existing conditions. Although the proposed action would not occur, it is assumed that growth in the region would continue under the no-action alternative, which could lead to development of another industrial use at the project site within the 20-year analysis period (2017 to 2037). Such development could result in impacts similar to those described for the proposed action.

3.4.5.2 Proposed Action

This section describes the impacts that could occur in the study area as a result of construction and routine operation of the proposed action. First, this section describes impacts from construction of the proposed action. It then describes impacts of routine operation at the project site and of routine rail and vessel transport to and from the project site.

Construction

No construction activities would occur outside of the project site; therefore, no construction activities would remove vegetation along or in Grays Harbor or along the PS&P rail line. Although construction would occur within 200 feet of Grays Harbor, no in-water work or shoreline work would be required, and thus, no impacts on shoreline or aquatic vegetation would occur. Therefore, the potential for construction to affect vegetation would be limited to onsite vegetation removal and impacts related to increased erosion from ground disturbance and the use of chemicals during construction and hydrostatic testing of the storage tanks.

Ground disturbance related to construction of the proposed action would result in the loss of approximately 10.9 acres of vegetation in the form of the scattered grasses and weeds around the northern periphery of the project site. These scattered grassy areas are early successional and weedy areas that do not support native plant species or provide valuable wildlife habitat. Construction would not affect the vegetation along the upper edges of Fry Creek. Such ground disturbance would also remove any noxious weeds from the project site. Additionally, vegetation loss would be mitigated through tree planting required under the City of Hoquiam's Landscaping and Screening Ordinance (Hoquiam Municipal Code [HMC] 10.05.065) based on the gross area of construction. The permit requirements specific to the proposed action are detailed in Section 3.4.6.

As described in Section 3.3, *Water*, construction activities could temporarily affect biological resources, including shoreline and aquatic vegetation near the project site, through soil disturbance, stockpiling and erosion of sediment, stormwater contamination from equipment and material usage, and temporary increases in turbidity during release of storage tank hydrostatic testing waters. These disturbances could temporarily increase total suspended solids near the project site and result in the release of construction vehicle fluids or construction materials. Such releases could result in increased turbidity and impacts on surface water quality. Depending on the extent and duration of the impairment, vegetation could be affected through interference with photosynthesis, respiration, growth, and reproduction.

As further discussed in Section 3.3, *Water*, the potential for water quality impacts during construction would be reduced by the implementation of permit conditions required by the NPDES Construction Stormwater General Permit from Ecology and Grade and Fill Permit issued by the city.

Compliance with these permits would require implementation of the Stormwater Drainage Control Plan, Temporary Erosion and Sedimentation Control Plan, and best management practices (BMPs) to reduce the potential for water quality and associated biological impacts resulting from soil disturbance. This would also require developing and implementing a spill prevention, control, and countermeasures plan, an oil spill prevention plan and a site-specific Construction Stormwater Pollution Prevention Plan that includes BMPs for material handling and construction waste management would reduce the potential for impacts from these sources.

Upon completion of hydrostatic testing of each newly constructed storage tank, the volume of water of the largest tank (80,000 barrels [3.4 million gallons]) would be discharged into Grays Harbor. Such activities could carry residual chemicals and other materials from tank construction, as well as any additives added to the water for testing (e.g., dyes, biocides), into the harbor, potentially affecting the water quality and increasing turbidity and thus affecting biological resources, including shoreline and aquatic vegetation in the vicinity of the project site.

If testing is to be conducted during the rainy season, the applicant anticipates that a biodegradable, environmentally safe dye would need to be added to the hydrotest water to allow for the visual discovery of leaks during wet conditions. Only one tank would be tested at a time, with the testing water pumped to each of the remaining tanks in succession as each test is completed. The potential for any impacts on vegetation along the shoreline of or within Grays Harbor or the Chehalis River would be reduced by testing of the hydrotest water to confirm compliance with Ecology's discharge requirements. Special treatment of the hydrotest water prior to discharge is not expected but if it is found that the water exceeds discharge requirements, the water would be treated appropriately (e.g., filtering, pH adjustment) onsite prior to discharge or shipped for offsite disposal if it could not be handled onsite. The dyed hydrotest water would be released into Grays Harbor through the Port of Grays Harbor stormwater system at a controlled rate to reduce the potential for erosion and increased turbidity around the outfall and to allow for dilution of the dyed water. Once diluted, the dye is not expected to affect the color of Grays Harbor. Because these activities would occur during the construction period, they would be covered under the applicant's NPDES Construction Stormwater General Permit and would be subject to the terms and conditions of that permit including any applicable BMPs, as describe in Section 3.3, *Water*.

Operations

This section describes impacts that would occur as a result of routine operations at the project site, rail transport along the PS&P rail line, and vessel transport through Grays Harbor.

Onsite

Operation of the proposed action would not affect plants at the project site, because the project site would be completely paved and no plants would be expected to colonize the developed site. Because the project site would be completely paved, colonization by noxious weeds would not likely occur during operations. However, the proposed action could affect plants in and around the harbor as the result of impacts on water quality associated with routine operations. As discussed in detail in Section 3.3., *Water*, stormwater runoff collected at the project site could contain contaminants associated with the operation and maintenance of vehicles and equipment (e.g., diesel fuel, oil, hydraulic fuel, antifreeze, tire and brake dust, exhaust particulates) and associated with small spills or leaks of bulk liquids, such as crude oil, related to the bulk loading transfer facilities.

Although small spills or leaks could occur as the result of human error or minor equipment failure, the potential for these incidents to occur would be reduced by appropriate training and the implementation of prevention and control measures as described in the spill prevention, control, and countermeasures plan and oil spill prevention plan. Specifically, prior to the commencement of bulk liquid loading operations at the project site, all personnel involved in liquid transfer operations would be trained in proper operating and spill-prevention procedures. All pipelines and loading equipment would be regularly inspected for leaks and wear and promptly repaired if necessary. During loading operations, the dock would be constantly attended to by the terminal operator who would have the ability to stop a transfer immediately if a leak or spill occurred from the dock or loading arm piping.

Additionally, as described in Chapter 2, *Proposed Action and Alternatives*, the containment areas underlying the rail unloading area and storage tanks are designed to contain spills or leaks to reduce the conveyance of chemicals to waterways. Spills of this size would be immediately contained and cleaned up by facility staff with on-hand materials consistent with BMPs to be implemented during operations (e.g., implementation and maintenance of a stormwater pollution prevention plan).

For these reasons, impacts related to these events present a very low risk to plants likely to be present along the shoreline near the project site. An analysis of impacts from increased risk of accidents (e.g., storage tank rupture) and related incidents (e.g., oil spills) is provided in Chapter 4, *Environmental Health and Safety.* All oil or hazardous material spills must be reported by the spiller, who must respond appropriately. Under state law (Revised Code of Washington [RCW] 90.56.370), anyone responsible for spilling oil into state waters is liable for damages resulting from injuries to public resources, including plants. The process for determining damages for an oil spill is called a natural resource damage assessment, as defined in WAC 173-183.

Rail

Operation of the proposed action at maximum throughput would add approximately two unit train trips[5] per day on average (730 per year maximum) along the PS&P rail line to the average three train trips per day (1,235 per year) under the no-action alternative (Section 3.15, *Rail Traffic*). This increased traffic and the associated routine operational activities could affect vegetation along the PS&P rail line as the result of increased exposure to pollutants (incidental leaks and spills). An analysis of impacts from increased risk of accidents (e.g., train derailments) and related consequences (e.g., oil spills) is provided in Chapter 4, *Environmental Health and Safety.*

An increase in leaks and spills of petrochemicals used in routine rail operations could occur due to the increased frequency of rail traffic and associated maintenance; the increase would be slightly higher compared to the no-action alternative. Diesel fuel, oils, grease, and other petrochemicals required for rail operation and maintenance could reach vegetation along the rail line through a small-scale spill or dripping from the train. These materials could either leak directly into vegetated areas along the rail bed or be carried short distances by precipitation or surface waters to more sensitive areas such as streams and wetlands through the openings on bridges and trestles. Impacts from a minor spill would be expected to be localized to the area of the spill adjacent to the rail line and would not be expected to spread across a wide area.

[5] A trip represents one-way travel; in other words, an inbound trip and an outbound trip are counted as two trips.

Vessel

Operation of the proposed action at maximum throughput would result in an average of approximately one tank vessel trip[6] per day (400[7] per year maximum) along the navigation channel compared to the 436 large commercial vessel[8] trips under the no-action alternative (Section 3.17, *Vessel Traffic*). This increased traffic and associated routine operation could result in water-quality concerns related to ballast water discharge and propeller wash and vessel wake. These impacts would be similar to, but slightly greater than, conditions under the no-action alternative. All spills of oil or hazardous materials from vessel operations are governed by RCW 90.56.370, as described for onsite operations.

Ballast Water

Vessels calling at the Terminal 1 berth would be required to discharge ballast water during the loading process. Ballast water is carried by empty vessel to provide stability during transit. As a vessel is loaded with cargo, ballast water is discharged to balance the weight of the new cargo. Ballast water discharge could contain a variety of materials that could harm aquatic plants. Primary among these contaminants are invasive marine plants and animals, bacteria, and pathogens that could displace native populations and harm aquatic life. Should an introduced species become a successful invader in a new environment, it can cause a range of ecological impacts. These include competing with native species and altering environmental conditions (e.g., increased water clarity due to mass filter-feeding), altering food web and the overall ecosystem and displacing native species, reducing native biodiversity and even causing local extinctions (Ibrahim and El-naggar 2012). These aquatic system impacts can also lead to economic and public health impacts.

As noted in Section 3.3, *Water*, the likelihood of such occurrences is considered low because vessels calling at Terminal 1 related to the proposed action are required to comply with the federal and state regulatory requirements listed in that section. However, requirements for ballast water treatment or exchange are not 100% effective. While following the ballast water requirements would reduce most of the potential for impacts on aquatic plants, the increase in the number of vessels related to the proposed action (a maximum of 200 per year) would increase the risk of introducing invasive aquatic plants and other organisms. Because the consequences of such an event would affect the native vegetation communities in Grays Harbor, additional monitoring requirements have been recommended, as described in Section 3.4.7.2, *Applicant Mitigation*.

Vessel Wakes

As noted in Section 3.1, *Earth*, operation of the proposed action could result in increased erosion within and along Grays Harbor related to increased vessel traffic. The location and extent of these impacts depends on a variety of factors, including climatic conditions, tidal conditions, vessel type, vessel location, and vessel speeds (U.S. Army Corps of Engineers 2014). However, there would be a small, incremental increase in the potential for impacts associated with wake compared with the no-action alternative, because operation of the proposed action would result in an additional tank vessel trips in the harbor.

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[6] A trip represents one-way travel.
[7] Proposed vessel trips are total for the facility so are not in addition to trips attributable to the applicant under the no-action alternative (approximately 14 per year).
[8] The term *large commercial vessels* refers collectively to tank and cargo vessels.

Propeller wash and wakes that extend farther or are more intense than those already occurring in the navigation channel and turning basin have the potential to cause erosion of sediments and possibly also low-lying intertidal vegetation along the shorelines closest to the navigation channel and turning basin (e.g., salt marsh along the northern shoreline of Rennie Island). Similarly, increased intensity of wash or wakes could uproot aquatic vegetation such as eelgrass and macroalgae if present in shallow areas along the outer boundaries of the navigation channel.

The potential for wake and propeller wash impacts along the shoreline of the turning basin near the project site is limited due to the lack of intertidal and aquatic vegetation along the northern banks of the turning basin. There is a potential for such impacts on intertidal vegetation along the northern shoreline of Rennie Island from large wakes, or wakes oriented perpendicular to the navigation channel or dock.

It is anticipated that the potential for impacts could be roughly proportional to the anticipated increase in vessel traffic. However, the actual extent, location, and magnitude of any such shoreline erosion impacts is influenced by the complex interaction of multiple factors that affect when, where, and with what intensity vessel wakes or prop wash turbulence would interact with the shorelines of the turning basin and Grays Harbor. Such factors can include vessel design, hull shape, vessel weight and speed, angle of travel relative to the shoreline, proximity to the shoreline, currents and waves, and water depth (Jonason 1993:29–30). The potential for shoreline erosion can also be influenced by the slope and physical character of the shoreline, as well as its amount and type of vegetation.

Overall, any water quality impacts caused by propeller wash and vessel wake would likely be short-term. Both Terminal 1 and the Cow Point Turning Basin are located in a portion of Grays Harbor that has a high existing baseline for turbidity (U.S. Federal Highway Administration and Washington Department of Transportation 2010:3.1–3-3). Consequently, vessel operations under the proposed action are not expected to increase turbidity levels substantially above existing conditions.

Vessel Shading

Docked large vessels can increase shading in the aquatic environment beneath and adjacent to existing berthing structures (e.g., docks, trestles). Shade can change primary productivity of aquatic plants, which can in turn affect fish behavior, predation, and migration (additional information about potential impacts on fish is presented in Section 3.5, *Animals*). As reviewed in Carrasquero (2001), light attenuation from overwater structures in freshwater environments can lead to lowered primary productivity in phytoplankton and macrophyte (e.g., eelgrass and macroalgae) producers. Reduced primary productivity, including reduced stock of algae and macrophytes, can in turn influence the epibenthic community on which fish and other aquatic organisms depend, particularly the epibenthic communities prevalent in shallow-water habitats.

The existing Terminal 1 dock generates shade in shallow-water habitat immediately adjacent to the shoreline, but the degree of shading is limited because the dock has a small footprint and is elevated over the water surface, allowing light to penetrate beneath it. Due to the dock's primarily east-west orientation, most of the shading around the dock occurs in the area between the dock and the shoreline and does not extend into the deepwater habitat of the adjacent navigation channel and turning basin.

Vessels berthed at the dock increase the shading of both shallow and deepwater habitat. The extent of this increased shading is determined by the size of the vessel and the length of time it is docked. Under the proposed action, tank vessels calling at Terminal 1 would be either tank barges or tankers

(Section 3.17, *Vessel Traffic*). The typical 550-class tank barge is approximately 512 feet in length and a maximum of 78 feet wide and is assisted by a tug that is approximately 127 feet long and a maximum of 42 feet wide, representing approximately 45,270 square feet (1.04 acres) of overwater shading of deepwater habitat.[9] With a maximum overall length of up to 950 feet and a maximum width of approximately 106 feet, Panamax class tankers would add approximately 100,700 square feet (2.31 acres) of overwater shading of deepwater habitat. The operational assumption is that a tank barge would occupy the berth for 24 hours and a tanker would occupy the berth for 48 hours (WorleyParsons 2014). At maximum throughput, a tank vessel would be docked at Terminal 1 up to 200 days per year.

As described in Section 3.4.4.3, *Grays Harbor*, eelgrass does not occur under the dock or along the adjacent shoreline. Low densities of sparsely distributed macroalgae have been found in the inner margins of the harbor on derelict pilings and boulder riprap armoring the shoreline near the project site. Neither eelgrass nor macroalgae occur in the deepwater habitat of the navigation channel. Macroalgae on derelict pilings and boulder riprap armoring the shoreline would not be affected by vessel shading because these substrates are not located beneath the dock where the vessels would be berthed.

Although some reduction in primary productivity from vessel shading is possible, the combination of tidal currents and the flow of the Chehalis River at Terminal 1 continually circulate water along the shoreline, around berthed vessels and the dock, and within the navigation channel and large body of Grays Harbor. As discussed in Section 3.5.4.1, *Project Site*, approximately 8,088 acres of deepwater habitat (areas that are maintain more than 18 feet of water at mean lower low water) are present in Grays Harbor, including the navigation channel and turning basin. Under the proposed action, the largest vessel size (Panamax) would create shade over 0.03% of the deepwater habitat in Grays Harbor. Deepwater habitats generally have lower primary production potential due to reduced penetration of sunlight with depth and increased turbidity. Therefore, the proposed action would not reduce the primary productivity of plankton or aquatic plants to any measurable extent.

3.4.6 What required permits and plans apply to plants?

The following permits conditions and required plans are expected to reduce impacts on plants.

- City of Hoquiam Conditional Land Use Permit
  - Comply with HMC 10.05.065 requiring planting 98 deciduous trees and planting 65 evergreen trees, based on the requirement to achieve 18 total caliper inches (i.e., 18 inches worth of tree trunk diameter—a measure of the size of trees at installation) of new deciduous trees and 18 feet total height of new evergreen trees (each tree being 3 feet high) for every gross acre of construction.

3.4.7 What mitigation measures would reduce impacts on plants?

This section describes the applicant mitigation that would reduce impacts on plants from construction and routine operation of the proposed action.

[9] This estimate is slightly high as the total length of the coupled tank barge is less than the collective lengths of the tank barge and tug.

3.4.7.1 Applicant Mitigation

The applicant will implement the following mitigation.

- To reduce the potential for impacts on aquatic plants from the increase in ballast water discharges during bulk liquid operations, the applicant will prepare an invasive species monitoring plan in consultation with Washington Department of Fish and Wildlife and implement prior to the start of the proposed operation.

3.4.8 Would the proposed action have unavoidable and significant adverse impacts on plants?

Compliance with the applicable regulations and permits along with implementation of the mitigation measure described above would reduce impacts on plants. There would be no unavoidable and significant adverse impacts. Potential impacts related to spills are addressed in Chapter 4, *Environmental Health and Safety*.

3.5 Animals

Many animal species inhabit the Grays Harbor area, including aquatic invertebrates, fish, and wildlife. The movements of wildlife (foraging, breeding, refuge, dispersal, and migration) affect and are affected by both the built and natural environments. Wildlife can affect habitat by consuming vegetation, insects, fish, or other animals; providing a source of prey and nutrients to other animals; and serving as a mechanism to disperse seeds. The aquatic habitats of Grays Harbor, including marine, estuarine, and freshwater habitat in the surrounding rivers and streams, support a variety of fish and aquatic species, including several types of native salmon, shellfish, and crab. In the Grays Harbor area, wildlife diversity also supports various aspects of the local culture and economy, including tourism.

This section describes animals in the study area, including invertebrates, fish, marine mammals, birds, and terrestrial wildlife, as well as special-status animal species. It then describes impacts on animals that could result under the no-action alternative or as a result of the construction and routine operation[1] of the proposed action. Finally, this section presents any measures identified to mitigate impacts of the proposed action and any remaining unavoidable and significant adverse impacts.

3.5.1 What is the study area for animals?

The study area for animals consists of animals and habitats (terrestrial and aquatic) on and near the project site that could be affected by construction and routine operations at the project site. The study area also includes animals that could be affected during routine rail transport along the Puget Sound & Pacific Railroad (PS&P)[2] rail line and vessel transport through Grays Harbor out to 3 nautical miles from the mouth of the harbor.

3.5.2 What laws and regulations apply to animals?

Laws and regulations for determining potential impacts on animals are summarized in Table 3.5-1. More information about these laws and regulations is provided in Appendix B, *Laws and Regulations*.

[1] Chapter 4, *Environmental Health and Safety*, addresses the potential impacts from increased risk of accidents (e.g., storage tank failure, train derailments, vessel collisions) and related incidents (e.g., release of crude oil or other proposed bulk liquids).
[2] The PS&P rail line refers to the rail line between Centralia and the project site.

Table 3.5-1. Laws and Regulations for Animals

Laws and Regulations	Description
Federal	
Endangered Species Act (16 U.S.C. 1531–1544)	Established with the intent of providing protections for imperiled species and the ecosystems upon which they depend.
The Magnuson-Stevens Fishery Conservation and Management (16 U.S.C. 1801)	Governs marine fisheries management in federal waters of the United States through the establishment of eight regional fishery management councils that are responsible for preparing fishery management plans.
Marine Mammal Protection Act of 1972, as amended 2007 (16 U.S.C. 31)	Protects marine mammals from take without appropriate authorization, which may only be granted under certain circumstances by NOAA Fisheries.
Migratory Bird Treaty Act of 1918 (16 U.S.C. 703–709)	Makes it illegal for anyone to take, possess, import, export, transport, sell, purchase, barter, or offer for sale, purchase, or barter, any migratory bird, or the parts, nests, or eggs of such a bird except under the terms of a valid permit issued pursuant to federal regulations.
Bald and Golden Eagle Protection Act of 1940 (16 U.S.C. 668 et seq.)	Prohibits the take of bald eagles, including their parts, nests, or eggs without a permit issued by USFWS.
Nonindigenous Aquatic Nuisance Prevention and Control Act of 1990, as amended by the National Invasive Species Act of 1996 (16 U.S.C. et seq. 4711)	Establishes and regulations enforced by the U.S. Coast Guard regarding the discharge into U.S. waters of aquatic nuisance species from ship ballast water.
Clean Water Act (33 U.S.C. 1251 et seq.)	Establishes the basic structure for regulating discharges of pollutants into navigable waters of the United States by regulating point pollution sources, such as stormwater discharges, and contains specific provisions related to the accidental release of oil and other hazardous substances into U.S. waters.
Oil Pollution Act of 1990 (33 U.S.C 2701 et seq.)	Establishes provisions that expand the federal government's ability to prevent and respond to oil spills and preserves State authority to establish law governing oil spill prevention and response.
State	
Growth Management Act (RCW 36.70A)	Requires the counties and cities of the state to prepare and adopt comprehensive plans that keep with the Growth Management Act planning goals.
Shoreline Management Act (RCW 90.58)	Establishes regulations for managing the use, environmental protection, and public access of the state's shorelines.
Department of Fish and Wildlife Permanent Regulations (WAC 232-12)	Establishes permanent regulations to manage and protect wildlife listed as endangered, threatened, and candidate species.
Water Resource Act of 1971 (90.54 RCW)	Sets fundamentals of water resource policy for the state to ensure adequate protection and optimal utilization for the people of the state by providing direction to state agencies and local governments.
Water Rights-–Oil and Hazardous Substance Spill Prevention and Response "Oil Spill Act" (RCW 90.56)	Establishes programs to reduce the risk and develop an approach to respond to oil and hazardous substance spills; provides a simplified process to calculate damages from an oil spill and holds responsible parties liable for damages resulting from injuries to public resources.

Laws and Regulations	Description
Oil Spill Natural Resources Damage Assessment (WAC 173-183)	Establishes procedures for convening a resource damage assessment committee, pre-assessment screening of damages, and selecting the damage assessment methodology.
Ballast Water Management Law (RCW 77.120)	Regulates discharge of ballast water into waters of the state for vessels of 300 gross tons or more.
Local	
Critical Areas Ordinance (HMC 11.06 and AMC 14.100)	Sets forth the definitions and process for designating and protecting critical areas within the city limits of Hoquiam and Aberdeen, respectively.
Shoreline Management (HMC 11.04 and AMC 16.20)	Carries out responsibilities imposed by the Shoreline Management Act of 1971.

U.S.C. = United States Code; NOAA = National Oceanic and Atmospheric Administration; USFWS = U.S. Fish and Wildlife Service; RCW = Revised Code of Washington; WAC = Washington Administrative Code; WDFW = Washington Department of Fish and Wildlife; HMC = Hoquiam Municipal Code; AMC = Aberdeen Municipal Code

3.5.3 How were impacts on animals evaluated?

This section describes the sources of information and methods used to evaluate impacts.

3.5.3.1 Information Sources

The Washington Department of Fish and Wildlife (WDFW) Priority Habitat and Species database provides comprehensive information on important fish, wildlife, and habitat resources in Washington. It is the principal means by which WDFW provides wildlife and habitat information to public and private entities. Priority habitats are habitat types with unique or significant value to many fish or wildlife species. Priority species are fish and wildlife species that require special efforts to ensure their perpetuation because of their low numbers, sensitivity to habitat alteration, tendency to form vulnerable aggregations, or because they are of commercial, recreational, or tribal importance.

WDFW maintains a priority habitat and species geospatial database that maps locations of priority species occurrences and priority habitats (Washington Department of Fish and Wildlife 2014a). These data were reviewed for documented occurrences of priority species and habitats in the study area. The priority habitat and species database includes Washington State species of concern, which are state-listed endangered, threatened, sensitive, and candidate species; and federally listed threatened, endangered, proposed, and candidate species. The priority habitat and species database also includes state-monitored species, which are not considered special-status but are monitored for status and distribution.

Special-status animal species described in this section are those listed as threatened, endangered, proposed, or candidate species under the federal Endangered Species Act (ESA) or listed as a WDFW species of concern. The U.S. Fish and Wildlife Service (USFWS) Information, Planning, and Conservation online planning tool (2014a) provided a list of federally listed animal species for Grays Harbor, Lewis, and Thurston Counties. The National Oceanic and Atmospheric Fisheries website provided a list of special-status marine species (National Oceanic and Atmospheric Administration 2014a, 2014b, 2014c).

A site visit was conducted in September 2014 at the project site, Grays Harbor National Wildlife Refuge, and along publicly accessible portions of the railroad corridor near Hoquiam.

3.5.3.2 Impact Analysis

The impact analysis for animals considered animals and habitats in the study area, specifically in and within 1 mile of the project site, within 0.5 mile on either side of the PS&P rail line, in and along the shoreline (0.5 mile inland) of Grays Harbor, and in the Pacific Ocean within 3 nautical miles of the entrance to Grays Harbor. Animal species likely to occur in the study area were identified based on known occurrences and the presence of appropriate habitat and geographic range using the information sources described above with a focus on the priority habitat and species database. Potential impacts on animals in the study area were determined by evaluating how construction and operation could affect habitats or disturb animals that may be present in the study area.

3.5.4 What animals are in the study area?

This section describes animals and habitats in the study area that could be affected by construction and routine operation of the proposed action. This section addresses animals and habitats at the project site, along the PS&P rail line, and in and along the shoreline of Grays Harbor.

3.5.4.1 Project Site

Terrestrial Habitats

The project site does not support native vegetation and does not provide natural habitat for terrestrial species. The projects site was a former boat slip that was filled with dredge material and wood debris between the 1980s and 1990s. The southeastern half of the site is paved, developed, and lacks landscaping. The northwestern half of the site was filled in 2011. This 10.9-acre area is now compacted with a sparse cover of various grasses and early successional and weedy plants. Plants growing on the fill material include herbaceous species such as Canada thistle (*Cirsium arvense),* bull thistle (*Cirsium vulgare*), curly dock (*Rumex crispus*), common horsetail (*Equisetum arvense*), Queen Anne's lace (*Daucus carota*), and Japanese knotweed (*Polygonum cuspidatum*). Himalayan blackberry (*Rubus armeniacus*), and Scot's broom (*Cytisus scoparius*), and black cottonwood seedlings (*Populus balsamifera*) have been noted along the Fry Creek Diversion Ditch. The project site is entirely fenced, restricting some access to the site. Animals likely to be found at the project site include common rodents, birds, invertebrates, and other small animals that are habituated to developed environments. Similarly, the lands surrounding the project site are largely disturbed and developed with industry, small businesses, and residences, and lack in natural areas that would provide quality habitat for terrestrial animals. Larger and highly mobile mammal species that are habituated to developed environments may also be present in and around the project site, including Columbian black-tailed deer (*Odocoileus hemionus columbianus*), raccoon (*Procyon lotor*), and striped skunk (*Mephitis mephitis*).

The closest undeveloped area to the project site is located approximately 0.75 mile to the north. This area consists of forested land, including evergreen, deciduous, and mixed forests. Animals that are likely to be found in these forested habitats include mule deer (*Odocoileus hemionus*), black bear (*Ursus americanus*), squirrels, raccoon, owls, and various species of hawks and songbirds.

Shoreline and Aquatic Habitats

The industrialized shoreline of Grays Harbor along Terminal 1 and the project site is armored with rock and riprap. It lacks the intertidal marsh communities that characterize the undeveloped portions of the Grays Harbor shoreline to the west and south of the project site. Along the approximate elevation of mean higher high water line, scattered beach logs are lodged on top of the riprap. Above the mean higher high water line, blackberry (*Rubus armeniacus*, *Rubus laciniatus*) canes are interspersed with the riprap and beach logs. Riprap provides habitat for various invertebrate species that inhabit rocky surfaces, including barnacles, limpets, anemones, seastars, crabs, and snails.

The aquatic habitat adjacent to the shoreline of the project site, referred to as the Cow Point Reach and Cow Point Turning Basin of the Grays Harbor Navigation Channel, provides relatively deep habitat. The U.S. Army Corps of Engineers annually dredges the navigation channel and turning basin to maintain a bottom depth of -36 feet mean lower low water and is currently seeking authorization to deepen the navigation channel and turning basin to its authorized depth of -38 feet mean lower low water (U.S. Army Corps of Engineers 2014). Grays Harbor contains approximately 8,088 acres of deepwater habitat (areas with more than 18 feet of water at mean lower low water) that could be used by multiple species of fish and other aquatic organisms. This includes both natural channel habitats and areas within the maintained navigation channel and turning basins.

Fry Creek adjacent to the northern boundary of the project site and provides habitat for aquatic species, including coho salmon, Chehalis coastal cutthroat trout (Washington Department of Fish and Wildlife 2014a), sculpin (*Cottus* spp.) three-spined stickleback (*Gasterosteus aculeatus*), and various invertebrates. Coho and cutthroat trout use the stream for migration and coho rear in the lower portion of the stream. The lower section of the stream is a straight, open channel lacking aquatic species habitat features such as large woody debris, boulders, riffles, and canopy cover. Coho outmigration occurs in the spring, peaking in May. Cutthroat outmigration begins as early as March, peaks from late May to early June, and continues through mid-July (Simenstad and Eggers 1981).

Special-Status Species

The priority habitat and species database lists no occurrences of special-status species in the study area near the project site. However, a pair of nesting peregrine falcons (state-sensitive species and federal species of concern) was recorded in 2006, approximately 0.75 mile from the site (Washington Department of Fish and Wildlife 2014a). According to the priority habitat and species database, the study area also includes breeding and wintering areas for peregrine falcons (Washington Department of Fish and Wildlife 2014a). Peregrine falcons nest on cliff ledges but also use tall, engineered structures such as bridges and power poles. Courtship begins as early as January, eggs are laid in the spring, and hatching occurs about a month later. Human disturbance is most likely to affect peregrines during courtship and incubation (Oregon Department of Transportation 2000:7). In addition to providing suitable breeding habitat for peregrine falcons, Rennie Island (located 0.3 mile southwest of the project site) provides suitable breeding habitat for two other special-status species: the great blue heron (*Ardea Herodias)* (state monitored) and bald eagles (*Haliaeetus leucocephalus*) (state-listed sensitive species and federal species of concern).

3.5.4.2 PS&P Rail Line

The PS&P rail line between Centralia and the project site extends through four general terrestrial vegetation communities: forests (coniferous, deciduous, and mixed), scrub-shrub, agriculture (cultivated crops, hay, pasture), and developed and barren lands (see Section 3.4.4.2, *Puget Sound & Pacific Railroad*, for descriptions of these vegetation communities). Residential and commercial developments are scattered along the majority of the corridor, with higher concentrations near Centralia and Elma into Aberdeen and Hoquiam (Figure 2-1). The PS&P rail line follows the Chehalis River Valley and in some areas is adjacent to the Chehalis River. Other habitats along the corridor include wetlands and surface waters.

Terrestrial Habitats

Forested habitats are found along much of the northern/eastern portions of the PS&P rail line between approximately Malone-Porter and Oakville, 25 to 30 miles southeast of the project site (Figure 2-1). Common mammal species such as bear, deer, raccoon, and squirrels are found in these areas, as well as owls, hawks, songbirds, reptiles, and invertebrates.

Scrub-shrub habitat is found along portions of the PS&P rail line northwest of Malone-Porter (Figure 2-1). Scrub-shrub wetlands also occur along the PS&P rail line in areas hydrologically influenced by the Chehalis River and its tributaries and in areas influenced by high groundwater conditions. Common species such as songbirds, rodents, and reptiles are found in scrub-shrub habitats. Scrub-shrub and emergent wetlands support large concentrations of wintering waterfowl, cavity nesting ducks, and nesting Canada goose (Washington Department of Fish and Wildlife 2014a).

Agricultural lands are found along several areas of the PS&P rail line, generally in or near the Chehalis River floodplain. These areas typically no longer support a native plant community and consist of cultivated croplands, hay, and pasture. Some of these agricultural lands support high concentrations of wintering waterfowl (Washington Department of Fish and Wildlife 2014a). Areas along the rail line containing cultivated crops include lands south of the rail line between Centralia and Oakville and west of Malone-Porter (Figure 2-1). Areas along the rail line containing hay or pasture include lands south of the rail line between approximately Grand Mound and Oakville and approximately Malone-Porter and Montesano.

Aquatic Habitats

Aquatic habitats along the PS&P rail line include 26 salmon-bearing streams that intersect the rail line (Bilhimer pers. comm.) Tributaries to the Chehalis River (from west to east) include the Wishkah River, Wynoochee River, Satsop River, Black River, and Skookumchuck River, as well as numerous other creeks, drainages, and associated wetlands. The Skookumchuk River is one of the main tributaries to the Chehalis River.

Special-Status Species

Based on priority habitat and species data, special-status species that may occur along the PS&P rail line include northern spotted owl (*Strix occidentalis*), marbled murrelet (*Brachyramphus marmoratus*), and three subspecies of western (Mazama) pocket gopher (*Thomomys mazama* ssp.). USFWS has designated critical habitat for the threatened bull trout (*Salvelinus confluentus*) in four streams either crossed by or adjacent to the PS&P rail line. In addition, USFWS has proposed critical

habitat for the threatened Oregon spotted frog (*Rana pretiosa*) near the rail line along the Black River, a tributary to the Chehalis River near Oakville, Washington.

Suitable habitat for northern spotted owl is located within forested habit along the rail line (Washington Department of Fish and Wildlife 2014a), however this habitat is not designated critical habitat under the ESA. The northern spotted owl is a state-listed endangered and federally listed threated species. The owl's range is associated with the presence of coniferous forests and it is strongly associated with structurally complex forests, such as old growth, but also uses mature and some younger forests. Habitat loss is an important threat to spotted owls (Washington Department of Fish and Wildlife 2013:63-68). Designated critical habitat for the marbled murrelet occurs in a small area of forested habitat along the rail line, approximately 30 miles southeast of the project site, just east and northwest of Oakville, Washington (Washington Department of Fish and Wildlife 2014a).

Three subspecies of western (Mazama) pocket gopher have recently been listed as threatened under the ESA: Olympia Mazama pocket gopher (*Thomomys mazama pugetensis*), Tenino Mazama pocket gopher (*T. mazama tumuli*), and Yelm Mazama pocket gopher (*T. mazama yelmensis*). These species are known to occur in Thurston County (approximately 10 miles of the PS&P rail line occurs in Thurston County) near the towns of Rochester and Grand Mound (Figure 2-2). However, there is no designated critical habitat in this area of the county.

USFWS has listed the threatened bull trout (*Salvelinus confluentus*) as occurring in streams in Grays Harbor, Lewis, and Thurston Counties, Washington. The rail line crosses several streams with documented bull trout presence, including the Wishkah River, Satsop River, and Wynoochee River, all three of which are designated as critical habitat for the species (Figures 3.3-1 and 3.3-2). In addition, the rail line is adjacent to the Chehalis River in some places, particularly around Porter, Washington, where the rail line is less than 50 feet from the river. The Chehalis River is also designated critical habitat for the species in this area.

USFWS has listed the threatened Oregon spotted frog as occurring or potentially occurring in Thurston County, Washington. The species inhabits emergent wetland habitats in forested landscapes, although it is not typically found under forest canopy (78 *Federal Register* [FR] 53586). USFWS has proposed critical habitat for the Oregon spotted frog near the rail line along the Black River. Based on the USFWS National Wetland Inventory, the proposed critical habitat near the rail line is forested wetland. Final designation of critical habitat may include this proposed area, or USFWS may decide that the area does not provide habitat critical to the species' survival and that it does not contain the primary constituent elements that are the physical and biological features required for species survival and reproduction.

Chehalis River Surge Plain Natural Area Preserve

The Chehalis River Surge Plain Natural Area Preserve (Figure 3.4-1) is located south of and adjacent to the rail line for approximately 5 miles. It is the largest and highest-quality coastal surge plain wetland in Washington State (Washington State Department of Natural Resources 2009: iii). The preserve supports two priority animal species: the bald eagle and the Olympic mudminnow (*Novumbra hubbsi*). Olympic mudminnows are endemic to Washington State and only occur in the southern and western lowland drainages of the Olympic Peninsula, the Chehalis River and Deschutes River drainages, and southern Puget Sound. They have been observed in a portion of the

preserve and likely occur throughout the abundant areas of suitable habitat (Washington State Department of Natural Resources 2009:20).

Most of the preserve provides high-quality nesting and foraging habitat for bald eagles. In addition, the preserve supports at least eight other species recognized by WDFW as conservation priorities in the priority habitat and species database: pileated woodpecker (*Dryocopus pileatus*) state-listed candidate species, Vaux's swift (*Chaetura vauxi*) state-listed candidate species, osprey (*Pandion haliaetus*) state-monitored species, reticulate sculpin (*Cottus perplexus*) state-monitored species, western brook lamprey (*Lampetra richardsoni*) state-monitored and federal species of concern, band-tailed pigeon (*Columbia fasciata*) state priority species, wood duck (*Aix sponsa*) state priority species, and mink (*Mylocheilus caurinus*) state priority species.

The preserve contains important osmoregulation and rearing habitat for anadromous salmonids, including spring and fall Chinook, coho, fall chum, and summer and winter steelhead. The surge plain also forms important winter rearing and refuge habitat for Chinook and coho that may be forced downriver during high winter flows in the river and its tributaries. Seventy-five different species of birds have been documented in the preserve, including 50 species that likely breed there, 16 that could breed there, and nine that are migrants or vagrants. There are several active bald eagle and osprey nests, as well as areas where band-tailed pigeons find important mineral salts early in the breeding season and again in late summer. Mammals observed in the preserve include black bear, beaver, raccoon, deer, river otter, Douglas squirrel, varying (or snowshoe) hare, and harbor seal. No formal amphibian surveys have been completed; however, red-legged frogs are known to occur and garter snakes and other common amphibians and reptiles are likely to be present given the diversity and quality of habitats (Washington State Department of Natural Resources 2009:22).

3.5.4.3 Grays Harbor

Grays Harbor is a large estuary that supports diverse species of fish, shellfish, benthic invertebrates, marine mammals, shorebirds, and other wildlife that use the study area. Most of these animals are special-status species. Appendix F, *Special-Status Species*, lists the animal species that may occur in Grays Harbor and their federal and state status. Several types of aquatic and intertidal vegetation communities occur in and along the shoreline of Grays Harbor, providing habitat for the various animal species. These vegetation communities are described in Section 3.4, *Plants*. The following description of Grays Harbor species and habitats is primarily based on a recently published analysis (U.S. Army Corp of Engineers 2014).

General Habitats and Associated Animal Species

Washington State considers native eelgrass (*Zostera marina*) beds a saltwater habitat of special concern (Washington Administrative Code [WAC] 220.110.250(3)(a,b)). Eelgrass habitat is important to many species of fish, invertebrates, and birds. Eelgrass provides shelter from predation and foraging areas and is an important nursery for several fish and invertebrate species, including salmonids and Dungeness crab (*Cancer magister*). Pacific herring (*Clupea pallasii*) spawn in eelgrass beds, depositing their eggs on the blades of vegetation. Spawning occurs between mid-January and early April (Washington Department of Fish and Wildlife undated:1). Eelgrass beds support waterfowl that overwinter in Grays Harbor as well as migrating shorebirds that stop to rest and feed during their annual spring migrations. Expansive beds of eelgrass are found in the north bay; the south bay and Elk River estuary area support smaller beds of eelgrass and herring spawning areas

(Figure 3.4-1). Eelgrass is not found in the navigation channel or the Cow Point Turning Basin adjacent to the project site.

Other important habitats surrounding the harbor include intertidal salt marsh, dunegrass, and low-elevation freshwater wetlands. Salt marsh habitats provide important resting and foraging habitat for migrating birds and rearing juvenile fishes. Salt marsh habitat is located in the Grays Harbor National Wildlife Refuge, along the northern shoreline of Grays Harbor (including much of the shoreline of the north bay), and along the shoreline of the south bay near the mouth of the Elk River and at the mouth of the Johns River (Figure 3.3-1) (Northwest Area Committee 2013: 6-3, 6-7; Washington Natural Heritage Program 2014). Dunegrass habitat is found along the sandy beaches and on the upland sand dunes along the shoreline of Grays Harbor and along the north shore of Damon Point.

Grays Harbor National Wildlife Refuge in located on the northeast corner of Grays Harbor. It is approximately 3 miles from the project site (Figure 3.4-1). The refuge includes approximately 1,500 acres of intertidal mudflats, salt marsh, and uplands and occupies approximately 2% of the estuary's intertidal habitat. Grays Harbor National Wildlife Refuge was established in 1990 to protect shorebird habitat. In 1996, Grays Harbor was designated a hemispheric reserve by the Western Hemisphere Shorebird Reserve Network as a site of international significance. The refuge hosts up to 50% of shorebirds that stage in the estuary (U.S. Fish and Wildlife Service 2014b, 2014c).

Aquatic Habitats

Fish

Grays Harbor and its tributaries provide habitat for various fish species, including salmonids, sturgeon, lamprey, groundfish, and forage fish. The Chehalis River is the largest tributary that drains directly into Grays Harbor. Other tributaries that empty into Grays Harbor are the Humptulips River, Hoquiam River, Johns River, and Elk River. Six species of salmonids are known to migrate and rear in portions of Grays Harbor and its tributaries. The salmon and trout of the Grays Harbor basin spawn in freshwater streams, rear for a portion of their life in their natal streams, emigrate to the marine environment where they rear for months or years depending upon the species, and then return to their natal stream to spawn.

Chum Salmon

Chum salmon found in Grays Harbor belong to the Pacific Coast chum evolutionary significant unit, but National Marine Fisheries Service (2009 in U.S. Army Corps of Engineers 2014: 79) also believes that Lower Columbia River chum evolutionary significant unit juveniles may rear in nearshore areas of Grays Harbor. Adult chum salmon of the Pacific Coast chum evolutionary significant unit migrate into rivers in the fall after the onset of heavy rains. These adults do not generally travel long distances to spawn and select reaches immediately upstream of tidal influence to build nests in gravelly substrate and lay their eggs. Immediately after hatching in the spring, juveniles move downstream into the estuary to rear in the nearshore environment. Their early outmigration to the estuary and the lengthy juvenile rearing that takes place there make chum salmon heavily reliant upon beneficial estuarine conditions.

Coho Salmon

Coho salmon found in Grays Harbor belong to the southwest Washington coho evolutionary significant unit. According to survey data, juvenile coho salmon of this evolutionary significant unit peak in mid-April to late May in the upper estuary near Cow Point and peak in the lower estuary 1 to 2 months later in mid- to late June. Thus, coho spend at least a portion of their juvenile rearing stage in the Grays Harbor estuary (Moser et al. 1991 in U.S. Army Corps of Engineers 2014:80). Coho salmon adults returning to spawn pass through Grays Harbor from August to October with the peak river entry typically occurring in September.

Chinook Salmon

Chinook salmon found in Grays Harbor belong to the Washington coast Chinook evolutionary significant unit. Two Chinook salmon runs, spring and fall, refer to the timing when adults return to the rivers to spawn. Juveniles of the fall run are typically ocean-type, and emigrate to marine waters as subyearlings. Stream-type juveniles of the spring run rear for a longer time in fresh water and emigrate the following year as yearlings. There are very few reports of yearlings being captured in the estuary (Sandell et al. 2011 in U.S. Army Corps of Engineers 2014:80), indicating that they move quickly through the system to reach marine waters outside of Grays Harbor. Juvenile Chinook salmon have been captured in the estuary from January through November (Tokar et al. 1970, Simenstad and Eggers 1981 in U.S. Army Corps of Engineers 2014:80) with peak catches occurring from May to June. There is evidence of Chinook juveniles residing in the estuary nearly year round, but numbers decline rapidly after June (Simenstad and Eggers 1981 in U.S. Army Corps of Engineers 2014:80).

Fall-run adults return to the freshwater rivers and streams to spawn and pass through Grays Harbor in September. Spring-run adults are likely to pass through Grays Harbor in April on their return trip to spawn in upper tributaries.

In addition to the Washington coast Chinook evolutionary significant unit, National Marine Fisheries Service (2009 in U.S. Army Corps of Engineers 2014:80) believes that juveniles of the Lower Columbia River Chinook evolutionary significant unit and Upper Willamette River Chinook evolutionary significant unit may be present in Grays Harbor at various times of the year depending on prevailing ocean currents.

Steelhead Trout

Steelhead trout found in Grays Harbor belong to the Washington coast distinct population segment. Steelhead trout exhibit a very diverse range of life histories, and can include both anadromous and resident type populations. Anadromous juvenile steelhead trout leave the freshwater system for marine waters anywhere from 1 to 5 years after hatching. While some steelhead trout exhibit an anadromous life history, fish of the same population may choose to rear for the entirety of their lives in fresh water.

Anadromous steelhead in Grays Harbor are winter-run, returning to rivers to spawn between November and April, typically peaking in December. Winter-run steelhead spawn shortly after reaching their spawning grounds, usually between January and March in the Chehalis River. Resident steelhead trout may be found in freshwater tributaries to Grays Harbor and not in the marine or estuarine waters of Grays Harbor.

Bull Trout

Bull trout found in Grays Harbor belong to the coastal/Puget Sound distinct population segment, and Grays Harbor is designated critical habitat for this distinct population segment. No bull trout populations have been documented in the tributaries to Grays Harbor (U.S. Fish and Wildlife Service 2004d in U.S. Army Corps of Engineers 2014:80), and major tributaries to Grays Harbor do not support bull trout spawning, rearing, or local populations. However, current and historical data indicate the presence of bull trout in Grays Harbor and the lower Chehalis River from mid-February through early July. Nearby Olympic Peninsula rivers support bull trout that are known to use Grays Harbor for foraging and rearing as adults. Habitat in Grays Harbor maintains connectivity between the Olympic Peninsula Management Unit's bull trout core areas and local populations (U.S. Fish and Wildlife Service 2014e:5).

Coastal Cutthroat Trout

Coastal cutthroat found in Grays Harbor belong to the southwestern Washington/Lower Columbia River distinct population segment. Similar to steelhead trout, coastal cutthroat trout have both anadromous and resident life-history forms. Anadromous forms migrate from freshwater areas in late winter and spring to feed in the highly productive nearshore coastal and estuarine environments. In winter, they re-enter fresh waters to feed and spawn. Coastal cutthroat trout may repeat this spawning/rearing cycle multiple times. Resident cutthroat trout may be found in the freshwater tributaries to Grays Harbor but would not be found in the marine or estuarine waters of Grays Harbor.

Table 3.5-2 presents the salmonid species that may occur in Grays Harbor and its tributary streams.

Table 3.5-2. Salmonid Species in Grays Harbor and Tributary Streams

Salmonid Species	Scientific Name	ESU or DPS	Listing Under the Federal Endangered Species Act	Life Stage Likely Found in Grays Harbor
Chum	*Oncorhyncus keta*	Pacific Coast Chum ESU	Not warranted	Outmigrating juveniles, returning adults
		Columbia River Chum ESU	Threatened	Rearing juveniles
Coho	*Oncorhyncus kisutch*	Southwest Washington Coho ESU	Not warranted	Outmigrating juveniles, returning adults
Chinook	*Oncorhyncus tshawytscha*	Lower Columbia River Chinook ESU	Threatened	Rearing juveniles
		Upper Willamette River Chinook ESU	Threatened	Rearing juveniles
		Washington Coast Chinook ESU	Not warranted	Outmigrating juveniles, rearing juveniles, returning adults
Steelhead trout	*Oncorhyncus mykiss*	Washington Coast DPS	Not warranted	Outmigrating juveniles, returning adults

Salmonid Species	Scientific Name	ESU or DPS	Listing Under the Federal Endangered Species Act	Life Stage Likely Found in Grays Harbor
Bull trout	*Salvelinus confluentus*	Coastal/Puget Sound DPS	Threatened	Rearing juveniles, foraging adults
Coastal cutthroat trout	*Oncorhyncus clarkia*	Southwestern Washington/Lower Columbia River DPS	Threatened	Outmigrating juveniles, rearing juveniles, foraging adults, returning adults

Source: U.S. Army Corps of Engineers 2014:79
ESU = evolutionary significant unit; DPS = distinct population segment

Green Sturgeon

The northern and southern populations of green sturgeon are found in Grays Harbor. Both populations originate from large coastal river systems including the Sacramento, Klamath, and Rogue Rivers. Northern and southern green sturgeon occurrence and habitat preferences in Grays Harbor are essentially identical. Subadult and adult green sturgeon are known to regularly use Grays Harbor during the summer and early fall months, primarily May through October. (Lindley et al. 2011 in U.S. Army Corps of Engineers 2014:195).The green sturgeon does not spawn in Grays Harbor tributaries and only occurs as foraging adults and subadults (National Marine Fisheries Service 2005 in U.S. Army Corps of Engineers 2014:81). Southern green sturgeon are currently listed as threatened under the ESA.

White Sturgeon

The white sturgeon is the largest North American sturgeon and a species of interest for the local tribes. It is found along the west coast from Alaska to north-central California, including in Grays Harbor (Scott and Crossman 1973 in U.S. Army Corps of Engineers 2014:81). White sturgeon is a slow-growing anadromous fish with reported estimated ages of up to 100 years (Environmental Protection Information Center et al. 2001 in U.S. Army Corps of Engineers 2014:81). White sturgeon are known to occur in Willapa Bay (located just south of Grays Harbor on the Pacific coast of Washington) (Emmett et al. 1991 in U.S. Army Corps of Engineers 2014:81). Quinault tribal members harvested 3,111 white sturgeon in Grays Harbor in 2008 and 1,107 in 2009 (Jorgensen pers. comm. in U.S. Army Corps of Engineers 2014:81).

Forage Fish, Groundfish, and Other Fish Species

Grays Harbor and adjacent nearshore marine areas provide habitat for a variety of forage fish, groundfish, and other fish species. Forage fish provide a prey base (forage) for numerous fish, birds, and marine mammals, including several threatened salmonids. The majority of these forage fish and groundfish are protected under the essential fish habitat provisions of the Magnuson-Stevens Act (Pacific Fishery Management Council 2011a, 2011b in U.S. Army Corps of Engineers 2014:81). A total of eight forage fish, 21 groundfish, and five other fish species are found in Grays Harbor and adjacent coastal nearshore habitats (Table 3.5-3).

Table 3.5-3. Forage Fish, Groundfish, and other Fish Species in Grays Harbor and Adjacent Coastal Nearshore Habitats

Forage Fish Species		
Pacific sand lance	Pacific herring	Northern anchovy
Market squid	Surf smelt	Pacific sardine
Pacific mackerel	Eulachon	
Groundfish Species		
Arrowtooth flounder	Pacific sanddab	Petrale sole
Pacific cod	Flathead sole	Soupfin shark
Spotted ratfish	Rock sole	Pacific staghorn sculpin
Dover sole	Pacific tomcod	lingcod
English sole	Starry flounder	Brown rockfish
Sand sole	California skate	Copper rockfish
Black rockfish	Redstripe rockfish	Spiny dogfish
Other Fish Species		
American shad	Arrow goby	Shiner perch
Three-spine sickleback	Surfperch	

Source: U.S. Army Corps of Engineers 2014:83–84

One forage fish, the southern eulachon distinct population segment, is listed as a threatened species under the ESA. The eulachon is a type of smelt that spawns in fresh water, is transported by river currents to estuarine and marine habitats as larvae, and lives the remainder of its life in the ocean before returning to spawn as an adult. The primary spawning habitats for the southern eulachon distinct population segment are in the lower Columbia River and its tributaries, but they occasionally spawn in river systems to the north of Grays Harbor on the Olympic Peninsula (Gustafson et al. 2010 in U.S. Army Corps of Engineers 2014:94). Eulachon commonly return to spawn in late winter and early spring, near the seasonal flow minimum (Lewis et al. 2002 in U.S. Army Corps of Engineers 2014:94). In many rivers, eulachon spawning appears to be timed so that egg hatching will coincide with peak spring river discharge (Flory 2008 in U.S. Army Corps of Engineers 2014:94). The juveniles are flushed rapidly downstream into the river estuary where they rear for weeks to months prior to entering the Pacific Ocean (Hay and McCarter 2000 in U.S. Army Corps of Engineers 2014:94). Adult eulachon typically reside in the upper third of the water column, whereas juveniles are found in higher densities near the bottom (Spangler 2002 in U.S. Army Corps of Engineers 2014:94). McCarter and Hay (2003 in U.S. Army Corps of Engineers 2014:94-95) note that larval eulachon are typically abundant at depths ranging from 0 to 15 meters (0 to 49 feet) below the surface.

Eulachon are not regularly observed in Grays Harbor or its tributaries and there is sporadic evidence as to their occurrence. Deschamps et al. (1970 in U.S. Army Corps of Engineers 2014:95) reported the capture of a single adult eulachon in March 1966 and stated that, "It is unlikely that the Chehalis system has a run of any consequence, although strays or feeding fish from other areas probably visit the upper harbor at times." However, Willson et al. (2006 in U.S. Army Corps of Engineers 2014:95) identified several Grays Harbor tributaries (Humptulips, Chehalis, Aberdeen, and Wynoochee Rivers) as supporting eulachon spawning runs. Eulachon have been reported sporadically in the tributary rivers to Grays Harbor, specifically the Wynoochee River (Washington Department of Fish and Wildlife and Oregon Department of Fish and Wildlife 2001; Willson et al. 2006 in U.S. Army Corps of Engineers 2014:95). Simenstad et al. (2001 in U.S. Army Corps of

Engineers 2014:95) recorded eulachon as a rare occurrence in sloughs of the Chehalis River estuary in 1990 and 1995. Their occurrence in Grays Harbor in recent years has been classified as rare (Gustafson et al. 2010 in U.S. Army Corps of Engineers 2014: 94). Based on these studies, eulachon appear to be sporadic visitors to Grays Harbor and to spawn occasionally in the rivers that are tributary to Grays Harbor. Critical habitat is designated for the southern eulachon distinct population segment, but it does not include Grays Harbor or its tributaries.

Invertebrates

A variety of invertebrates uses Grays Harbor, including Dungeness crab (*Cancer magister*), clams, oysters, and a diverse epibenthic community. These invertebrates provide forage for the fish, birds, and other wildlife in Grays Harbor. Commercial harvest of Dungeness crab and farming of oysters provide substantial inputs to the local economy of the communities surrounding Grays Harbor. In addition, the Dungeness crab fishery is important to four coastal tribes, including the Quinault Tribe, which has usual and accustomed fishing grounds in Grays Harbor.

Dungeness Crab

The expansive mudflats and dendritic tidal channels of Grays Harbor provide highly productive habitat for juvenile Dungeness crabs, and the structural complexity of eelgrass beds provide cover, rearing, and foraging habitats (Armstrong et al. 2003 in U.S. Army Corps of Engineers 2014:70). The inner harbor reaches, with more mud and silt, are not as suitable to rearing crabs as the sandier outer harbor reaches. Unstructured littoral habitats are important foraging areas for juvenile and subadult Dungeness crabs (Holsman et al. 2006:183). Holsman et al. (2006:193) also suggests that these unstructured habitats, including mud and sandflats in the intertidal areas, may be primary foraging areas critical to crab production. Armstrong et al. (1991 in U.S. Army Corps of Engineers 2014:69) found that crab abundance in Grays Harbor ranged from about 3 to 28 million crabs, depending on season. Crab populations are highest during mid spring through early summer, and begin to decline toward the end of summer through fall. Trawl surveys in the Grays Harbor Navigation Channel reported an average Dungeness crab density of 678 crabs per hectare (Armstrong et al. 1991 in U.S. Army Corps of Engineers 2014:69).

Grays Harbor Dungeness crabs are harvested commercially and by the Quinault Tribe. WDFW nontreaty commercial Dungeness crab landings data indicate that 9,247 pounds of crab were harvested in Grays Harbor (catch reporting area 60B) in 2013/2014, with an overall average of 91,372 pounds per year between 1997 and 2014 (Washington Department of Fish and Wildlife 2014b; U.S. Army Corps of Engineers 2014:73). Quinault-reported treaty crab landings data indicates an average of 7,755 pounds of crab harvested per year between 1997 and 2012. Harvest is the large anthropogenic stressor on crab populations in Grays Harbor.

Other Invertebrates

A variety of invertebrates, including worms, nematodes, copepods, amphipods, crustaceans, and mollusks, inhabit Grays Harbor and provide forage for numerous species of birds and fish. Oysters and clams (mollusks) are farmed over 900 acres in Grays Harbor (Green et al 2009 in U.S. Army Corps of Engineers 2014:76), and Pacific oysters are found in the intertidal or shallow subtidal zones of Grays Harbor attached to hard substrates. Oyster beds are located primarily in the south and central portions of Grays Harbor (Washington Department of Fish and Wildlife 2014a). Oysters feed on small organisms that they filter from the water column. Spawning occurs annually in July or August when water temperatures rise above 19.5°C. Water temperature greatly influences

development rates, but typically, young oysters attach to hard substrate approximately 2 weeks after fertilization, where they will stay attached for the remainder of their lives.

Marine Mammals

Marine mammals are frequently observed in Grays Harbor. California sea lions (*Zalophus californianus*) and harbor seals (*Phoca vitulina*) are the most common species. Harbor seal haulout sites are located throughout the estuary, primarily in the north and central bays (Washington Department of Fish and Wildlife 2014a). Many of the haulouts are used during the pupping season (mid-April through June) when peak abundances occur (Jeffries et al. 2000:vii; Washington Department of Fish and Wildlife 2014a). The harbor seal haulout closest to the navigation channel is located approximately 200 meters away, which is twice the distance recommended by the National Marine Fisheries Service (100 meters) to avoidance disturbance related to vessel traffic. Harbor seal abundance also peaks during the annual molt July through August (Jeffries et al. 2000:12). Fewer male California sea lions use the estuary seasonally, from the fall through late spring (Jeffries et al. 2000:viii). Steller sea lions (*Eumetopias jubatus*) use the Pacific Ocean near Grays Harbor and may enter the estuary on occasion.

Several ESA-listed whale species may occur off the Washington coast near Grays Harbor. These include blue, fin, and sei whales (*Balaenoptera musculus, B. physalus,* and *B. borealis,* respectively), sperm whale (*Physeter macrocephalus*), killer whale (*Orcinus orca*), and humpback whale (*Megaptera novaengliae*), all of which are federally listed and state-listed as endangered. Other whale species that may occur in the waters off Grays Harbor are the pygmy sperm (*Kogia breviceps*), common minke (*Balaenoptera acutorostrata*), and the state-listed sensitive gray whale (*Eschrichtius robustus)*. The occurrence of these species in the coastal waters of Washington State ranges from exceptionally rare (blue whales) to relatively common (humpback whales) (Carretta et al. 2011 in U.S. Army Corps of Engineers 2014: 88).

Sea Turtles

Sea turtles that occur in Washington coastal waters include the leatherback (*Dermochelys coriacea*), loggerhead (*Caretta caretta*), green (*Chelonia mydas*), and olive ridley (*Lepidochelys olivacea*) sea turtles (National Oceanic and Atmospheric Administration 2014c). The loggerhead sea turtle is listed as threatened; the remaining species are listed as endangered. All four turtle species occur in Washington waters at varying frequencies but only as adults. They are highly unlikely to occur in Grays Harbor or the nearshore areas.

Shorebirds and Waterfowl

Grays Harbor estuary is located along the Pacific Flyway, a migratory flight corridor between Alaska and South America. It is one of four major staging areas for migrating shorebirds in North America, with shorebirds congregating in the mudflats to feed and rest during spring and fall migrations. Approximately 24 species of shorebirds use the Grays Harbor National Wildlife Refuge during migrations, which begin in late April and continue through mid-May. The spring migration is concentrated, with hundreds of thousands of shorebirds arriving for a brief stay during their northern migrations. Fall migrations begin in July and continue through September. The fall migration is less concentrated, as shorebirds leave their breeding grounds at different times. In the winter, lesser numbers of shorebirds can be found at the refuge; dunlin (*Calidris alpina*) is one

species that overwinter at the refuge. Waterfowl and raptors are abundant during the winter months (U.S. Fish and Wildlife Service 2014f).

Western sandpiper (*Calidris mauri*) and dunlin are the most abundant shorebird species found at the refuge, with semipalmated plover (*Charadrius semipalmatus*), least sandpiper (*Calidris minutilla*), red knot (*C. canutus*), and black bellied plover (*Pluvialis squatarola*) common during migration. Other birds that commonly use the refuge include the peregrine falcon, bald eagle, northern harrier (*Circus cyaneus*), Caspian tern (*Hydroprogne caspia*), great blue heron, songbirds, and various waterfowl (U.S. Fish and Wildlife Service 2014f).

Marbled murrelet is a seabird that feeds on forage fish in open marine waters. While extensive survey data of marbled murrelets in and around Grays Harbor are lacking, murrelets likely occur in low numbers in the Grays Harbor area throughout the year, particularly during the fall, winter, and spring (Pearson et al. 2011; Speich and Wahl 1995 in U.S. Army Corps of Engineers 2014:95).

Dunegrass habitat around Damon Point is one of three critical nesting habitat areas used by snowy plover (*Charadrius alexandrius nivosus)* in Washington State and is designated as critical habitat under the ESA. Snowy plover is a federally listed threatened and state-listed endangered shorebird with a breeding season that extends from March through September (U.S. Fish and Wildlife Service 2014g).

The streaked horned lark (*Eremophila alpestris strigata*) is a ground-dwelling songbird that is federally listed as threatened and state-listed as endangered. Designated critical habitat includes Damon Point, where a breeding population is located. In Washington, nesting areas for the streaked horned lark include grasslands and sparsely vegetated areas at airports, sandy islands, and coastal spits (Washington Department of Fish and Wildlife 2013:69-73). The nesting season begins in late March and continues through August (U.S. Fish and Wildlife Service 2014h).

As noted above, peregrine falcon breeding and wintering areas are known to occur in the study area. Additionally, peregrine falcon overwintering areas are located near Grays Harbor, including in Grays Harbor National Wildlife Refuge approximately 4 miles to the west, in the south bay approximately 12 miles to the southwest, and in a large portion of the north bay approximately 10 miles to the northwest (Washington Department of Fish and Wildlife 2014a).

Two priority species habitats were identified near the project site on Rennie Island, but outside of the study area: a great blue heron (*Ardea Herodias*) rookery in 2002 and a bald eagle (*Haliaeetus leucocephalus*) nest in 2005. Great blue herons nest in large groups. Their foraging, breeding, and prenesting habitats are usually close to each other: most colonies are within 1.9 miles of key foraging grounds (Larsen et al. 2004:3-1 to 3-18). During the breeding season, coastal herons can find most of their required nutrition in eelgrass meadows and other estuarine habitats (Larsen et al. 2004:3-1 to 3-18). Herons are especially susceptible to human disturbance, predation, and competition for nesting habitat (Larsen et al. 2004:3-1 to 3-18). Bald eagles are known to feed and nest in and around Grays Harbor and along the Chehalis River near the PS&P rail line. Bald eagle habitat includes estuaries, large lakes, reservoirs, rivers, and some seacoasts. They require nesting sites, perching areas, and a good food base primarily of fish and carrion (U.S. Fish and Wildlife Service 2007).

One additional documented special-status species was identified nearby but outside of the study area: purple martins (*Progne subis*) were documented as nesting near the mouth of the Hoquiam River in 1988. Purple martin is a state-listed species of concern and further identified as a priority

for breeding areas. Grays Harbor is a breeding area for purple martins. They nest in natural cavities found in tree snags and crevices and in artificial nest boxes and gourds provided by humans for this purpose (Larsen et al. 2004:31-1 to 31-4).

Washington State Department of Natural Resources Marine Protected Areas

Five WDNR Marine Protected Areas managed by the Washington State Department of Natural Resources are found in Grays Harbor.

- Whitcomb Flats Natural Area Preserve
- North Bay Natural Area Preserve
- Goose Island Natural Area Preserve
- Sand Island Natural Area Preserve
- Elk River Natural Resources Conservation Area

The Whitcomb Flats Natural Area Preserve is a small accretion island that is seasonally overtopped, and where island sands shift continually. The accretion island supports nesting seabird colonies including western gulls and Caspian terns, as well as nonbreeding bald eagles and black-bellied plover. The Whitcomb Flats Natural Area Preserve protection level is *No Impact*, which allows human access but prohibits all activities that could harm the site's resources or disrupt the ecological or cultural services it provides (Washington State Department of Natural Resources 2015a). The Whitcomb Flats Natural Area Preserve is about one third of a mile south of the navigation channel.

The North Bay Natural Area Preserve contains one of the highest quality coastal freshwater and sphagnum bog systems remaining in Washington, and supports priority habitat features including shorebird and waterfowl concentration areas, harbor seal haulout and pupping areas, and Roosevelt elk and peregrine falcon wintering areas. The North Bay Natural Area Preserve protection level is *No Access*, which restricts human access to prevent potential ecological disturbance (Washington State Department of Natural Resources 2015b). The North Bay Natural Area Preserve is on the north side of Grays Harbor along and in the North Bay and is over 5 miles from the navigation channel.

The Goose Island Natural Preserve Area is a small, sandy accretion island that is seasonally overtopped, and where island sands shift continually. The accretion island supports a large colony of nesting seabirds including gulls, brants, long bill curlew, and historically, Caspian terns. Brown pelicans use the island after breeding season. Following submersion during severe winter storms, the shifting dunes on this island have been recolonized by vegetation and nesting birds as the ecosystem rebuilds (Washington State Department of Natural Resources 2015c). The Goose Island Natural Preserve Area is in the North Bay of Grays Harbor more than 3.5 miles from the navigation channel.

The Sand Island Natural Area Preserve is a small, sandy accretion island that is seasonally overtopped, and where island sands shift continually. The accretion island protects nesting seabird colonies, historically including Caspian terns. Bald eagles, double-crested cormorants, brown pelicans, brants, ring-billed gulls, sandpipers, and many other birds use the island. The island supports sand dune vegetation and provides a haulout site for seals (Washington State Department of Natural Resources 2015d). The Sand Island Natural Area Preserve is in the North Bay of Grays Harbor more than 2.5 miles from the navigation channel.

The Elk River Natural Resources Conservation Area is the largest high-quality estuarine system remaining in Washington. The area supports diverse habitats that include tide flats, sloughs, saltmarsh wetlands, freshwater wetlands, and forested uplands. The shoreline area is an important stopover area for migrating shorebirds and waterfowl, including common loon, tundra swan, and various species of ducks, plovers, and sandpipers. It is estimated that up to 1 million shorebirds utilize the area annually. The habitats also support nesting bald eagles, elk, bear, beaver, river otter, and other mammals (Washington State Department of Natural Resources 2015e). The protection level for the conservation area is *Uniform Multiple Use*, which provides a consistent level of protection and allowable activities, including certain extractive uses, across the entire area. The Elk River Natural Resources Conservation Area is just more than 3 miles south of the navigation channel at its closest point, along the shoreline of South Bay of Grays Harbor.

3.5.5 What are the potential impacts on animals?

This section describes impacts on animals that could occur in the study area. Potential impacts of the no-action alternative are described first, followed by impacts of the proposed action.

3.5.5.1 No-Action Alternative

Under the no-action alternative, the applicant would continue to operate its existing facility as described in Chapter 2, Section 2.1.2.2, *Existing Operations*. Although the proposed action would not occur, it is assumed that increased growth in the region would continue under the no-action alternative, which could lead to development of another industrial use at the project site within the 20-year analysis period (2017 to 2037). Such development could result in impacts similar to those described for the proposed action.

3.5.5.2 Proposed Action

This section describes impacts that could occur in the study area as a result of construction and routine operation of the proposed action. First, this section describes impacts from construction of the proposed action. It then describes impacts of routine operation at the project site and of routine rail and vessel transport to and from the project site.

Construction

Construction of the proposed action could affect animals at or around the project site by removing habitat, causing animal mortality, increasing noise disturbance, and temporarily causing water quality impacts that would affect aquatic habitat.

Terrestrial Habitat Impacts and Animal Mortality

Construction of the proposed action would be limited to the project site. No construction activities would occur outside of the project site and construction activities would not remove habitat along or within Grays Harbor or along the existing PS&P rail line. Although project site construction would occur within 200 feet of Grays Harbor, no in-water construction work or shoreline construction work would be required, and no loss of shoreline or aquatic habitat would occur.

Construction would result in the permanent loss of approximately 10.9 acres of scattered grass and weed areas around the edge of the project site. These areas do not support native plant communities and do not provide valuable habitat to animals. In addition, the project site is surrounded by a chain-

link fence with barbed wire along the top, which is a barrier to most animals. Animals that could pass through or over the top of the fence—common rodents, birds, invertebrates, and other small animals—would be displaced to other habitat areas outside the project site if present during construction. However, these animals are already habituated to the developed conditions of the project site and surrounding area, and larger areas of equivalent or higher quality habitat outside of the project site are available and accessible.

Construction activities could also increase the mortality of animals that may get into the project site during construction, resulting from construction equipment collisions. However, animals are mobile and are typically able to avoid construction areas; the risk of this impact would be temporary and would last only the duration of construction. Given the low quality and small amount of habitat that would be removed, the low probability of animals accessing the site, the existence of equivalent or higher quality habitat outside of the site and beyond, and the short-term use of construction equipment, potential construction impacts on animals from land-disturbance activities would not affect species populations or fitness (the ability of a population to maintain or increase its numbers in succeeding generations).

A potential beneficial impact on habitat and animals that would result from the proposed action would be the City of Hoquiam's requirement to provide mitigation for new development in the form of a landscaping plan. Construction of the proposed action would result in the development of the project site, and per the City of Hoquiam's municipal code (10.05.065), mitigation for this new development would be planting a required number of trees based on the gross area of construction. The quantity of trees is based on the requirement to achieve 18 total caliper inches (18 inches of tree trunk diameter—a measure of the size of trees at installation) of new deciduous trees and 18 feet total height of new evergreen trees for every gross acre of construction. This required landscaping would provide a new habitat type and a habitat that would exceed the quality of habitat (10.9 acres of nonnative grass and weeds) removed during construction. Because the project site would be completely developed, that landscaping plan would be implemented outside of the project site.

Noise

While animals in and around the project site are already habituated to noise levels associated with industrial and developed areas, noise would increase above ambient levels for the duration of the construction activity. The Federal Railroad Administration provides guidance for characterizing the potential impacts on the people and terrestrial animals that may be exposed to increased noise levels. The threshold above which noise would disturb wildlife is 100 A-weighted decibels (dBA) sound exposure level. Construction noise associated with all activities other than pile driving is anticipated to fall below this threshold within 50 feet of the activities; therefore, construction noise is not likely to affect animals present in the surrounding area.

As indicated in Section 3.7, *Noise and Vibration*, noise from pile driving is anticipated to be greater than 100 dBA sound exposure level within 0.85 mile of the project site. However, as indicated in the discussion of the affected environment (Section 3.5.4), no special-status species has been recently documented in the study area and although there is suitable habitat for the bald eagle, blue heron, and peregrine falcon, it is unlikely that these species would be found near the project site. Regardless, if any terrestrial animals are present near the site during pile driving, they could be affected during construction.

An animal's reaction to elevated noise levels could range from mild annoyance to escape behavior, causing it to expend energy, or to move into a new, less-familiar area, which can lead to a greater exposure to predation and other risks. However, noise impacts would be short-term and temporary, lasting only the duration of project construction. Given that the species present near the project site are already habituated to noise levels associated with industrial areas and are generally mobile, and given that any elevated noise would be temporary, it is anticipated that noise impacts would not affect species populations or fitness.

Pile driving on land and near water can result in high underwater sound pressures. The mechanism for fish injury is related to high pressures created when a pile is struck with an impact pile driver. The repeated exposure of fish to cumulative sound energy over the course of a day is also thought to result in injury. When the pile is struck, the pile vibrates and radiates sound energy directly into the water. Energy is also imparted into the ground and sound energy is radiated into the water from the ground. Aquatic species, including bull trout, green sturgeon, eulachon, and chum and Chinook salmon could be affected by noise from pile driving. Although occurrence of these species is limited to certain times of the year and in some cases may be rare, if any aquatic animals are present near the site during pile driving, there is a potential for impact.

Guidance issued by the Fisheries Hydroacoustic Working Group[3] indicates peak and accumulated noise thresholds greater than 206 decibels peak or 183 dBA sound level exposure (as measured underwater) have the potential to harm fish. The peak threshold refers to the maximum sound level produced by any single strike. The accumulative thresholds refer to the accumulated sound energy associated with a series of pile strikes for a 24-hour period. The peak threshold is not predicted to be exceeded, but the 183-dBA threshold for accumulative noise is predicted to be exceeded at the closest water bodies, Fry Creek and the Chehalis River. Exposure to high levels of underwater noise can cause changes in behavior and result in possible injury (Popper et al. 2006; Popper and Hastings 2009a, 2009b). Implementation of the mitigation in Section 3.5.7.2, *Applicant Mitigation*, would address this impact.

Aquatic Habitat Impacts

No in-water construction would be required, but ground-disturbing activities, equipment and material use, and hydrostatic testing could result in contaminants reaching nearby surface waters and affecting aquatic habitat (see Section 3.3, *Water*, for description of pathways of contaminant discharge to surface waters). These potential impacts would be completely avoided or reduced through the requirements of the grade and fill permits that would be needed for construction. Compliance with these permits would require implementation of a stormwater drainage control plan, temporary erosion and sedimentation control plan, and best management practices (BMP) to reduce the potential for water quality and associated biological impacts resulting from soil disturbance. This would also require developing and implementing a spill prevention, control, and countermeasures plan, an oil spill prevention plan and a site-specific construction stormwater pollution prevention plan that includes BMPs for material handling and construction waste management would reduce the potential for impacts from these sources.

Although unlikely given the conditions and requirements to obtain this permit, any contaminant that reaches a surface water body could affect aquatic habitat and aquatic animals near the contaminant

[3] The Hydroacoustic Working Group was established in 2000 to direct research, develop analysis methods, and develop thresholds for injury. Participants include Washington, Oregon, and California departments of transportation, the National Marine Fisheries Service, and the Federal Highway Administration.

discharge. These contaminants could have toxic acute or subacute impacts on aquatic organisms and could affect photosynthesis, oxygen exchange, and the respiration, growth, and reproduction of aquatic species. These impacts would be short-term and temporary, lasting only the duration of construction.

Operations

This section describes impacts that would occur as a result of routine operations at the project site, rail transport along the PS&P rail line, and vessel transport through Grays Harbor.

Onsite

Routine operations at the project site could affect animals as a result of increased noise and spills or small leaks. Increased noise could affect animals in a manner similar to increased construction noise by causing disturbance and avoidance behaviors. Incidental spills or leaks could affect water quality and aquatic habitat in and around the Grays Harbor shoreline. Both of these impacts are discussed below.

Operations of the proposed action would result in noise that could affect animals near the project site. Although additional activity (related to the transfer of bulk materials) would occur under the proposed action, as discussed in Section 3.7, *Noise and Vibration*, noise levels are anticipated to be similar to existing operations. Additionally, as noted above, animals in the area are already habituated to noise levels associated with industrial areas. For these reasons, operational noise related to the proposed action is not anticipated to affect animals in or surrounding the project site.

As discussed in Section 3.3, *Water*, the proposed action could slightly increase the potential for water quality impairment related to routine operations. Stormwater runoff could contain contaminants associated with routine operations (e.g., chemicals used to operate and maintain vehicles and equipment, tire and brake dust, exhaust particulates, and small spills or leaks of bulk liquids, such as crude oil associated with the bulk loading transfer facilities). Although small spills or leaks could occur as the result of human error or minor equipment failure, the potential for these incidents to occur would be reduced by appropriate training and the implementation of prevention and control measures as described in the spill prevention, control, and countermeasures plan and oil spill prevention plan. Specifically, prior to the commencement of bulk liquid loading operations at the facility, all personnel involved in liquid transfer operations would be trained in proper operating and spill prevention procedures. All pipelines and loading equipment would be regularly inspected for leaks and wear and promptly repaired if necessary. During loading operations, the dock would be constantly attended by the terminal operator who would have the ability to stop a transfer immediately if a leak or spill occurred from the dock or loading arm piping.

Additionally, as described in Chapter 2, *Proposed Action and Alternatives*, the containment areas underlying the rail unloading area and storage tanks are designed to contain spills or leaks to the conveyance of chemicals to waterways. Spills of this size would be immediately contained and cleaned up by facility staff with on-hand materials consistent with BMPs to be implemented during operation of the facility (e.g., implementation and maintenance of a stormwater pollution prevention plan). The applicant has also committed to cease all vessel-loading operations for a 2-week period each year during the Grays Harbor Shorebird Festival. This would reduce the potential risks of affecting shorebirds during this key migratory period.

For these reasons, impacts related to routine operations present a very low risk to animals likely to be present along the shoreline near the project site. In addition, all spills of oil or hazardous materials must be reported by the spiller and response actions taken. Under state law (Revised Code of Washington [RCW] 90.56.370), anyone responsible for spilling oil into state waters is liable for damages resulting from injuries to public resources, including animals. The process for determining damages of an oil spill is called a Natural Resource Damage Assessment, as defined in WAC 173-183. An analysis of impacts from increased risk of incidents (e.g., storage tank rupture), the related consequences (e.g., oil spills), and mitigation is provided in Chapter 4, *Environmental Health and Safety*.

Rail

Operation of the proposed action at maximum throughput would add approximately two unit train trips[4] per day on average (730 per year maximum) along the PS&P rail line to the average three train trips per day (1,235 per year) under the no-action alternative (Section 3.15, *Rail Traffic*). This increased traffic and the associated routine operational activities could affect animals along the PS&P rail line as the result of increased noise, increased potential for animal mortality (collisions with moving trains), and increased exposure to pollutants (incidental leaks and spills). An analysis of impacts from increased risk of accidents (e.g., train derailments) and related incidents (e.g., oil spills) is provided in Chapter 4, *Environmental Health and Safety.* All spills of oil or hazardous materials from vessel operations are governed by Water Rights—Oil and Hazardous Substance Spill Prevention and Response (RCW 90.56.370), as described for onsite operations.

Noise

Operational noise (primarily train horns at PS&P rail line grade crossings) could affect animals along the PS&P rail line during rail operations. As with any sound in the atmosphere, the intensity of noise and the distance it travels can vary and depends on many factors, including atmospheric conditions (e.g., wind, temperature, humidity) at the time of rail operations. While animals along the PS&P rail line are already habituated to noise levels associated with existing train operations, increased train traffic would increase the frequency of train noise. Increased noise frequency from train operations could displace animals that may be in or around the rail corridor during operations. A species' reaction to operations noise could range from mild annoyance to escape behavior, causing it to expend energy or to move into a new area that is less familiar, which can lead to a greater exposure to predation and other risks.

However, rail operation noise impacts would be short-term, lasting only the duration of the train passing. In addition, the distances from the track where rail noise reaches the Federal Railroad Administration wildlife noise disturbance threshold (100 dBA sound exposure level) are estimated to be small: 50 feet for wayside noise (locomotive and car/wheel noise) and between 100 and 200 feet from grade crossings where horns are sounded. The species along the rail line are already habituated to noise levels associated with rail operations and are generally mobile. Furthermore, the noise and short distances from the tracks where the Federal Railroad Administration's wildlife noise disturbance threshold would be reached would be temporary. Therefore, the noise impacts from the additional trains would likely be imperceptible and would not affect species populations or fitness.

[4] A trip represents one-way travel; in other words, an inbound trip and an outbound trip are counted as two trips.

Animal Mortality

Additional rail trips on the PS&P rail line could increase mortality of animals because of collisions with trains and increased predation risk. While animals along the PS&P rail line are already habituated to the movement of existing trains, increased train traffic could increase strikes with animals that may be on the tracks and cannot escape a passing train. Animals that feed on carrion that use the rail line as a movement corridor, or use habitats adjacent to the rail line, could have an increased incidence of collision mortality. However, the animal species along the PS&P rail line have already adapted to disturbances associated with train movements and the predator-prey relationships have likely stabilized since construction of the PS&P rail line. As such, while the risk for animal mortality would increase compared to the no-action alternative, the increase in rail traffic is not likely to affect species populations or fitness.

Incidental Leaks and Spills

An increase in leaks and spills of petro-chemicals used in routine rail operations could occur due to the increased frequency of rail traffic and associated maintenance, and would be slightly greater than the no-action alternative. Diesel fuel, oils, grease, and other petrochemicals required for rail operation and maintenance could reach vegetation along the rail line through a spill or dripping from the train. The potential impacts on vegetation are described in Section 3.4, *Plants*, and would be the same for animal habitat. A spill could affect individual animals in the immediate vicinity of the spill. However, a spill on an individual animal would be unlikely as the animal would have already cleared from the area due to human and equipment presence, and the spill would likely be small and would be contained and cleaned up quickly per operating and maintenance protocols for rail operations and maintenance spills. An analysis of impacts from increased risk of accidents (e.g., train derailments) and related incidents (e.g., large-scale oil spills, explosion, or fire) is provided in Chapter 4, *Environmental Health and Safety.* All spills of oil or hazardous materials from vessel operations are governed by Water Rights—Oil and Hazardous Substance Spill Prevention and Response (RCW 90.56.370), as described for onsite operations.

Vessel

Operation of the proposed action at maximum throughput would result in an average of approximately one tank vessel trip[5] per day (a maximum of 400 per year[6]) along the navigation channel compared to the 436 large commercial vessel[7] trips under the no-action alternative (Section 3.17, *Vessel Traffic*). This increased traffic and associated routine operations could result in water quality concerns related to vessel wake, vessel strikes, and increased noise disturbance. These impacts would be similar to but somewhat greater compared with the no-action alternative.

An analysis of impacts from increased risk of accidents and related incidents (e.g., oil spills) is provided in Chapter 4, *Environmental Health and Safety*. All spills of oil or hazardous materials from vessel operations are governed by Water Rights—Oil and Hazardous Substance Spill Prevention and Response (RCW 90.56.370), as described for onsite and rail operations.

[5] A trip represents one-way travel.
[6] Proposed vessel trips are total for the facility so are not in addition to trips attributable to the applicant under the no-action alternative (approximately 14 per year).
[7] The term *large commercial vessels* refers collectively to tank and cargo vessels.

Ballast Water and Biofouling

As noted in Section 3.3, *Water*, tank vessels calling at the Terminal 1 berth would be required to discharge ballast water during the loading process. Ballast water is carried by empty vessels to provide stability during transit. As a vessel is loaded with cargo, ballast water is discharged to balance the weight of the new cargo. Vessels calling at Terminal 1 can also transport biofouling organisms (e.g., algae and invertebrates) that settle onto submerged surfaces (e.g., vessel hulls) between waters.

Ballast water discharge and vessels supporting biofouling organisms could transfer a variety of materials into Grays Harbor that could harm aquatic ecosystems. Primary among these contaminants are invasive marine plants and animals, bacteria, and pathogens that could displace native populations and harm aquatic life. Should an introduced species become a successful invader in a new environment, it can cause a range of ecological impacts. These include competing with native species and altering environmental conditions (e.g., increased water clarity due to mass filter-feeding), altering food web and the overall ecosystem and displacing native species, reducing native biodiversity and even causing local extinctions (Ibrahim and El-Naggar 2012). These aquatic system impacts can also lead to economic and public health impacts.

Although the total number of vessel arrivals and the related volume of ballast water discharged are important components of the risk, vessel numbers may not be a directly proportional indicator of risk of nonindigenous species invasion (Verling et. al. 2005; Cordell et al. 2015). Other factors include the densities of organisms surviving in ballast water (Verling et al. 2005), which is influenced by the geographic source, season, and environmental conditions during transport; increased mortality with increased voyage length; and population dynamic differences within and between different taxonomic groups of organisms (Verling et. al. 2005; Marine Invasions Research Lab 2012). The risks are also influenced by environmental factors independent of the number of individuals discharged into the receiving water, such as availability of suitable habitat, patch size, and seasonal conditions at time of discharge (Verling et. al. 2005). Similarly, the risk of introduction of nonindigenous organisms through biofouling is influenced by factors such as vessel design (e.g. surface complexity), vessel maintenance (e.g. age of antibiofouling paint, maintenance methods and frequency), and vessel voyage pattern (Davidson et al. 2014).

Shorter, coastwise voyages where survival is more variable and final densities are higher may pose a greater risk of successful establishment of a nonindigenous species from ballast water discharge (Marine Invasions Research Lab 2012; Verling et al. 2005). This risk is greater if ballast water held for a short duration is discharged into waters and environments with similar conditions, such as can occur during coastwise transport. Cordell et al. (2015) found that coastwise transport in oil tankers traveling relatively short distances between California ports and Puget Sound had densities of zooplankton in their ballast water that would place them in the higher risk category relative to the U.S. Coast Guard's density standards for retained organisms. Similarly, Verling et al. (2005) found that plankton survival was inversely correlated with voyage duration (i.e., shorter voyages resulted in greater survival in the ballast water).

As noted in Section 3.3, *Water*, vessels calling at Terminal 1 related to the proposed action are required to comply with the federal and state regulatory requirements listed in Section 3.6.2. However, although midocean exchange of ballast water is an accepted (and required) method to limit the introduction of nonindigenous aquatic species into Washington State waters, it is not 100% effective. This is due to variations in vessel design, density of the plants and animals present in the intake water, ballast water age or duration of voyage, and exchange procedures (Verling et al. 2005;

Minton et al. 2005; Ruiz and Smith 2005; Cordell et al. 2015). Research indicates that midocean exchange of ballast water, when correctly implemented, removes more than 80% of coastal zooplankton from a ballast tank, depending on ship type, duration of the voyage, density of zooplankton in the intake water, and ballast tank design (Minton et. al. 2005; Ruiz and Smith 2005). Studies in Puget Sound indicate that oil tankers are one of the vessel types for which ballast water exchange can be highly effective, but also that tug barges and tankers retain the highest densities of nonindigenous zooplankton, particularly those that travel over relatively short distances up or down the coast from heavily invaded estuaries in California (Cordell et al. 2015). Such vessels can pose a substantial risk for introducing nonindigenous species into receiving waters such as Grays Harbor. WDFW requires and monitors ballast water discharges and conducts inspections of vessel ballast water for vessels operating in Washington State waters.

Similarly, although vessel maintenance and cleaning to remove biofouling organisms is required under federal law, specific requirements are largely undefined with little enforcement of these requirements in the United States or in Washington State (Davidson et al. 2014). In Washington, WDFW and Washington State Department of Ecology (Ecology) require vessel operators to receive approval for in-water hull cleaning (Washington Department of Fish and Wildlife 2015).

While following the ballast water requirements and maintenance procedures to reduce biofouling would reduce the potential for impacts on aquatic plants (and animals), the increase in the number of vessels related to the proposed action (a maximum of 200 per year) and the likely use of short-distance coastal transit of oil tankers between California ports and Terminal 1 would increase the risk of introducing invasive aquatic plants and other organisms. Because the consequences of such an event would affect the native ecosystems and animals in Grays Harbor, additional monitoring requirements have been recommended, as described in Section 3.4.7.2, *Applicant Mitigation*.

Vessel Wakes

As noted in Section 3.1, *Earth*, operation of the proposed action could increase the potential for erosion within and along the harbor as a result of vessel wake related to increased vessel traffic. As noted in Section 3.1, the location and extent of these effects would depend on a variety of factors, including climatic conditions, tidal conditions, vessel type, vessel location, and vessel speeds. However, there would be an incremental increase in the potential for impacts associated with wake, compared with the no-action alternative, as a result of increased tank vessel trips under the proposed action.

Wakes generated by vessels related to the proposed action could reach shoreline areas and potentially affect nearshore aquatic species, especially juvenile fish, by washing them ashore and stranding them on the shoreline. Juvenile fish tend to reside in nearshore waters where warmer water and food as well as cover from higher velocity flows and predation in the harbor are abundant (Vehanen et al. 2000 in Irvine et al. 2014:1). Consequently, this puts young fish at risk of being stranded on shallow, sloped beaches, in isolated pools, or in the open spaces of dry substrate by sudden changes in water levels, such as the wake waves generated by passing vessels.

The U.S. Army Corps of Engineers (USACE) studied vessel-induced juvenile salmon stranding along three shallow, sloped Columbia River beaches. USACE considered 19 variables that could affect fish stranding due to vessel wakes, including tidal stage, tidal height, river flow, current velocity, ship type, ship direction, ship condition (loaded/unloaded), ship speed, ship size, and ship kinetic energy. Different types of vessels were found to produce wakes leading to different patterns of drawdown and run-up on the shore. USACE observed fish strandings from four vessel types (bulk carriers,

container ships, tankers, and car carriers), but not tug boats. The frequency of stranding events differed by vessel type; the order from highest frequency was tanker, container ship, car carrier, and bulk carrier. USACE observed various fish species stranded along the study beaches, with Chinook salmon the predominant stranded species (U.S. Army Corps of Engineers 2006:47).

The impacts on a stranded fish vary and would depend on several factors (e.g., the species of fish, location and stranding, tide cycle). When a fish strands, it can either succumb to mortality through direct effects of stranding, such as drying (Bradford et al. 1995 in Irvine et al. 2014:1), or be rewetted (Beck and Associates 1989 in Irvine et al. 2014:1). Those fish that do not incur mortality may suffer nonlethal stress effects such as decreased growth (Korman and Campana 2009 in Irvine et al 2014:1) or depletion of energy reserves (Cunjak et al. 1998 in Irvine et al 2014:1; Scruton et al. 2008 in Irvine et al. 2014:1), or may habituate to the stress of the fluctuating environment (Taylor et al. 2012 in Irvine et al. 2014:1). A stranded fish may also make easy prey for bird species that feed on fish, especially certain raptors or shoreline and sea birds.

Vessels approaching Terminal 1 would operate in the North Channel Reach of the navigation channel. Several small islands and mudflats occur throughout Grays Harbor, and, depending on the tide, could be exposed to wave action and could be locations for fish strandings. The nearest island to the navigation channel is Whitcomb Flats (about 800 feet south of the navigation channel), which is a small but growing sandy island. Should small fish be present in areas exposed to vessel wakes, fish could be washed ashore (on a mud flat or other shallow shoreline area) and become stranded. However, as discussed in Section 3.17, *Vessel Traffic*, incoming and outgoing vessels would most likely transit the harbor when tidal heights are at least 5 feet above the mean lower low waterline. Outgoing loaded vessels may wait until the tide is even higher for safety purposes (higher tides would provide deeper waters for heavier vessels that would be traveling lower in the water). This would reduce the potential for fish strandings because of the reduced exposure of mud flat and shallower sloped beach areas where stranding would most likely occur. In addition, any speed restrictions for vessels would reduce the size of the vessel wake. Based on the USACE study (2006;111), tugboat wakes would be expected to generate wakes that would not result in fish strandings.

Vessel Shading

Docked large vessels can increase shading in the aquatic environment beneath and adjacent to existing berthing structures (e.g., docks, trestles). This can result in changes to productivity as well as fish behavior, predation, and migration. As reviewed in Carrasquero (2001), shading from overwater structures in freshwater environments can lead to lowered primary productivity (phytoplankton and macrophyte producers; e.g., eelgrass and macroalgae). Reduced primary productivity, including reduced stock of algae and macrophytes, can in turn influence the epibenthic community on which fish and other aquatic organisms depend, particularly the epibenthic communities prevalent in shallow-water habitats.

The existing Terminal 1 dock generates shade in shallow-water habitat immediately adjacent to the shoreline, but the degree of shading is limited because the dock has a small footprint and is elevated over the water surface, allowing light to penetrate beneath it. Due to the dock's primarily east-west orientation, most of the shading occurs in the shallow area between the dock and the shoreline and does not extend into the deepwater habitat of the adjacent navigation channel and turning basin. As described in Section 3.4.4.3, *Grays Harbor*, eelgrass habitat does not occur under the dock or along the adjacent shoreline. Neither eelgrass nor macroalgae occur in the deepwater habitat of the

navigation channel. Macroalgae on derelict pilings and boulder riprap armoring the shoreline would not be affected by vessel shading because these substrates are not located beneath the dock where the vessels would be berthed.

Vessels berthed at the dock increase the shading of both shallow habitat closer to the dock and shoreline, and deepwater habitat under the vessel in the navigation channel. The extent of this increased shading is determined by the size of the vessel and the length of time it is docked. Under the proposed action, tank vessels calling at Terminal 1 would be either tank barges or tankers (Section 3.17, *Vessel Traffic*). The typical 550-class tank barge that is approximately 512 feet in length with a maximum width of 78 feet and a tug that is approximately 127 feet long with a maximum width of 42 feet, adding a total of approximately 45,270 square feet (1.04 acres) of overwater surface area over deepwater habitat.[8] With a maximum overall length of up to 950 feet and maximum width of approximately 106 feet, Panamax class tankers would add approximately 100,700 square feet (2.31 acres) of overwater shading area above deepwater habitat. The operational assumption is that a tank vessel would occupy the berth for 24 hours and a tanker would occupy the berth for 48 hours (WorleyParsons 2014). At the maximum proposed annual throughput, the applicant would have a tank vessel docked at Terminal 1 a maximum of 200 days per year.

Although some reduction in primary productivity from vessel shading is possible, the combination of tidal currents and the flow of the Chehalis River at Terminal 1 continually circulate water along the shoreline, around berthed vessels and the dock, and within the navigation channel and large body of Grays Harbor. As noted in Section 3.5.4.1, *Project Site*, approximately 8,088 acres of deepwater habitat are present within Grays Harbor, including the navigation channel and turning basin. Under the proposed action, the largest vessel size (Panamax) would create shade over 0.03% of the deepwater habitat in Grays Harbor. Deepwater habitats generally have lower primary production potential due to reduced penetration of sunlight with depth and increased turbidity. Therefore, the proposed action would not reduce primary productivity.

Shading could affect fish migration, prey capture, or predation. The extent to which an increase in shading may alter the predator-prey relationship is unknown, but it is assumed that the relationship would change and an increase in predation would be likely. Vessels would be located over deepwater habitat and could provide shaded habitat for larger predatory fishes (e.g., bass and northern pikeminnow) as well as roosting sites for piscivorous birds (Carrasquero 2001). Salmon fry tend to migrate along the edges of shadows rather than penetrate them (Simenstad et al. 1999). Studies in the northwest have documented this behavioral tendency to use shadow edges for cover during migration (Shreffler and Moursund 1999). Salmon fry are also known to use darkness and turbidity for refuge. The underwater light environment could affect the ability of fishes such as bass to see and capture their prey, which could include juvenile salmonids. Foraging opportunities for most juvenile fish are generally associated with shallow-water habitat (above -20 feet), which provide more benthic organisms than deepwater habitat (below -20 feet). Juvenile salmon primarily migrate in shallow-water habitat, although larger juvenile salmon do migrate in deepwater habitat. Juvenile salmon migrating in deepwater habitat are likely migrating relatively quickly and not rearing for extended periods in any particular area.

[8] This estimate is slightly high as the total length of the coupled tank vessel is less than the collective lengths of the barge and tug.

Vessel Strikes

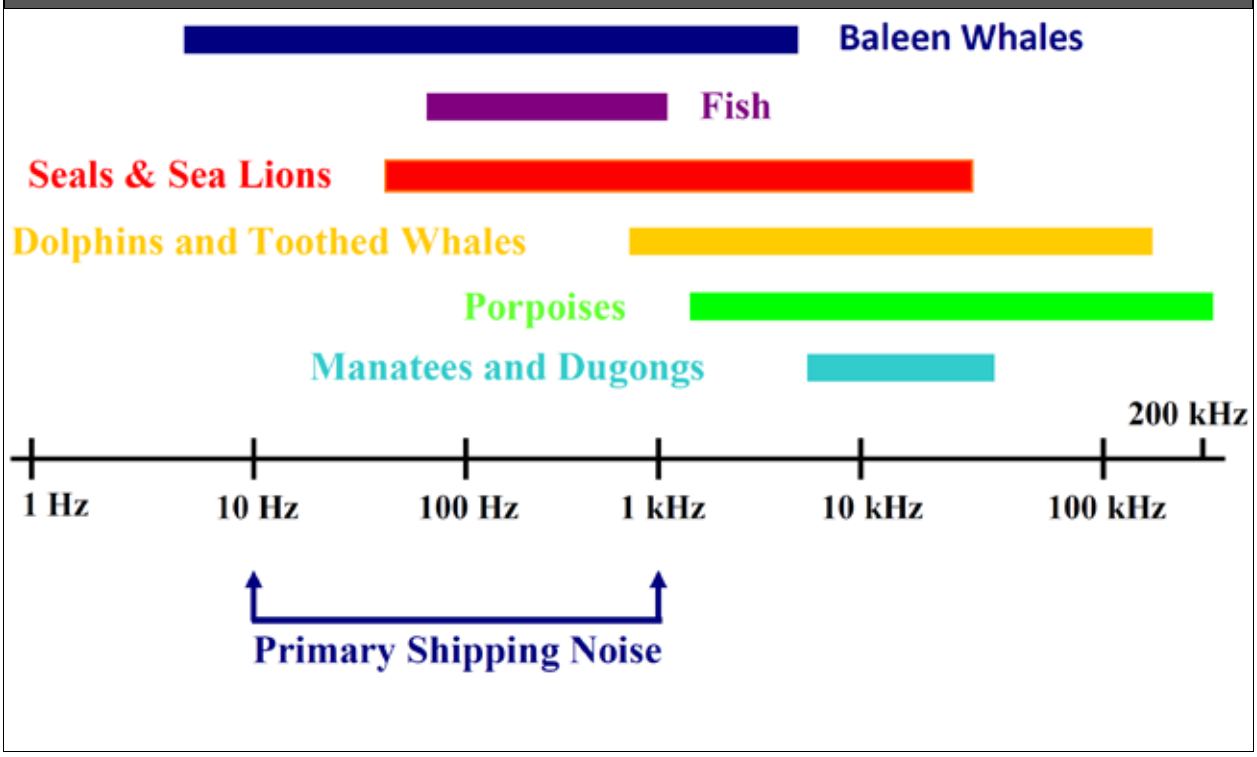
Collisions with ships are one of the primary threats to marine mammals, particularly large whales, along the U.S. west coast, and around the world. Related to the proposed action, the greatest potential for vessel strikes to occur would be in the shipping lanes, which are located outside of state waters (farther than 3 nautical miles from the coast). This is because large mammals, like whales, typically migrate and forage in deeper waters and are not likely to enter the harbor. However, there is some potential for vessels to strike marine animals within the study area, particularly during transits outside the harbor but within 3 nautical miles of the harbor mouth. Depending on the circumstances (i.e., vessel speeds, vessel type, type of animal, animal behavior), the impacts could vary widely, but could include bone fractures, organ damage, and internal hemorrhages (National Oceanic and Atmospheric Administration 2008a:4). There are cases in which small marine mammals survived strikes but sustained injuries and disfigurement to dorsal fins and other body parts (National Oceanic and Atmospheric Administration 2008a:17). In Sarasota Bay, Wells and Scott (1997 in National Oceanic and Atmospheric Administration 2008a:17) documented four cases of vessel strikes on bottlenose dolphins in which all four animals survived the strike. The potential for strikes in the study area would be somewhat greater compared with the no-action alternative because of the increase in vessel trips.

Underwater Vessel Noise

Increased vessel traffic related to the proposed action would generate increased underwater noise that could affect aquatic animals, especially marine mammals because they rely on sound as a means of communication, for finding food and mates, and for detecting predators. Increasing background noise levels decrease communication ranges, and may modify behavior and induce stress responses (Wright 2008:13). The effects of increased noise associated with vessel trips would depend on many factors, including vessel type, size of vessel, species of animal, vessel location, and location of animal relative to vessel and the intervening environment. Complex behavioral responses to the same noise source can range from mild to severe and can vary dramatically among species and individuals, making it challenging to broadly characterize impacts of shipping noise on marine mammal species (Ellison et al. 2012 in Joint Working Group on Vessel Strikes and Acoustic Impacts 2012:9). The potential for impacts in the study area would increase somewhat under the proposed action, as a result of increased vessel trips.

Underwater noise levels associated with vessels are typically between 10 Hertz (Hz) and 1 kilohertz (kHz) (Wright 2008:6). Tankers, such as those likely to be used for the proposed action, exhibit noise frequencies at the lower end of the spectrum (40 Hz) compared to bulk carriers (100 Hz). Additionally, tank barges with tugs, the vessels most likely to be used under the proposed action, typically produce less near-surface sound than other vessels. This is not because they are quieter but because the propellers of the typical tug are recessed to protect the propeller from damage in case of grounding. With the propeller in this position, propeller noise is blocked by the ship's hull. Thus, the propeller noise cannot be heard ahead of the tug and barge (University of Rhode Island 2013).

Figure 3.5-1. Frequency Relationship between Marine Animals Sounds and Sounds from Shipping



Source: Wright 2008:6

As shown in Figure 3.5-1, many marine animals, including those listed in Section 3.5.4, hear within a range of a higher frequency than vessel-generated underwater noise, including the killer whale. Killer whales produce a variety of sounds including clicks, whistles, and pulsed calls. Individual clicks have been estimated to range in frequency from 8 kHz to 80 kHz; whistles from 500 Hz to 10.2 Hz; and pulsed calls from 1 kHz to 10 kHz (National Oceanic and Atmospheric Administration 2008b:6). With respect to vessel noise, NOAA Fisheries (2008b:49, 52) has described the relevant frequency range of killer whale hearing from 1kHz to 100 kHz, which is outside of the range of primary shipping noise (Figure 3.5-1). Marine mammals have also adapted to varying levels of natural sound, and the adaptive mechanisms may allow them to function normally in the presence of many anthropogenic sounds. The unknown variable is when introduced sounds exceed the adaptive capacity of marine mammals and pose a threat to individual animals or their populations (Marine Mammal Commission 2007:12). Effects of underwater noise exposure on marine organisms have been generally characterized by the following range of physical and behavioral responses (Richardson et al. 1995 in BOEM 2012:87).

- **Behavioral reactions.** Range from brief startle responses to changes or interruptions in feeding, diving, or respiratory patterns, to cessation of vocalizations, to temporary or permanent displacement from habitat.
- **Masking.** Reduction in ability to detect communication or other relevant sound signals due to elevated levels of background noise.
- **Temporary threshold shift.** Temporary, recoverable reduction in hearing sensitivity caused by exposure to sound.

- **Permanent threshold shift.** Permanent, irreversible reduction in hearing sensitivity due to damage or injury to ear structures caused by prolonged exposure to sound or temporary exposure to very intense sound.
- **Nonauditory physiological effects.** Effects of sound exposure on tissues in nonauditory systems either through direct exposure or because of changes in behavior (e.g., resonance of respiratory cavities or growth of gas bubbles in body fluids).

3.5.6 What required permits and plans apply to animals?

The following permit conditions and required plans are expected to reduce impacts on animals.

- City of Hoquiam and City of Aberdeen Critical Areas Review for fish and wildlife habitat and geologically hazardous areas
  - Critical area review report
  - Buffer establishment and protection requirements
  - Buffer mitigation and monitoring requirements
  - Buffer activity limits and restrictions
- City of Hoquiam and City of Aberdeen Shoreline Substantial Development Permits
  - Consistency with the Shoreline Management Master Program
  - Protection of shoreline resources and functions
- Washington State Department of Ecology National Pollutant Discharge Elimination System Construction Stormwater General Permit
  - Discharge/effluent limit requirements
  - Monitoring, sampling and reporting requirements
  - Onsite spill control material provision requirements
  - Stormwater pollution prevention plan preparation requirement
  - Stormwater BMP development and implementation
- Washington State Department of Ecology National Pollutant Discharge Elimination System Industrial Stormwater Permit
  - Discharge/effluent limit requirements
  - Monitoring, sampling, and reporting requirements
  - Operations and maintenance plan
  - Stormwater pollution prevention plan
  - Onsite spill control material provision requirements
  - Spill prevention control and countermeasures plan preparation requirement
  - Industrial discharge BMP development and implementation

3.5.7 What mitigation measures would reduce impacts on animals?

This section describes voluntary measures, design features, and applicant mitigation measures that would reduce impacts on animals from construction and routine operation of the proposed action.

3.5.7.1 Voluntary Measures and Design Features

The following voluntary measures and design features would reduce impacts on animals.

- To reduce the risk of spills affecting migratory birds during peak spring migration (typically 2 weeks), the applicant will coordinate with the City of Hoquiam to receive advance notice of the date for the annual Grays Harbor Shorebird Festival and will halt crude oil vessel-loading operations for a period of 2 weeks each year overlapping with the event.

3.5.7.2 Applicant Mitigation

The applicant will implement the following mitigation.

- To reduce the risk of harm to sensitive aquatic species from pile driving, the applicant will investigate alternative pile driving methods such as vibratory pile driving and hydraulic press-in methods to eliminate the need for impact pile driving.
- If these methods are determined to be infeasible, the applicant will retain a qualified acoustical consultant to monitor underwater sound levels during pile driving at the closest in-water location 1 meter deep. Piles will be driven first at locations that are closest to the water bodies of concern. The most extreme accumulated sound exposure level will determine the maximum number of piles that can be driven in a day. If measured underwater sound levels at the closest location do not exceed the applicable accumulated sound exposure level threshold during the first 2 days of pile driving, no additional monitoring will be required and pile driving will continue. If the accumulated sound exposure level is exceeded at the closest distance, monitoring will be moved to a distance of 210 feet from the pile driving. If on any given day the accumulated sound exposure level threshold is exceeded at that distance, pile driving for that day will be stopped and continued the next day.
- To reduce the potential for impacts on sensitive aquatic animals from the increase in ballast water discharges during bulk liquid operations, the applicant will prepare an invasive species monitoring plan in consultation with WDFW and will implement the plan prior to the start of the proposed operations.

3.5.8 Would the proposed action have unavoidable and significant adverse impacts on animals?

Compliance with the applicable regulations and permits along with implementation of the mitigation measure described above would reduce impacts on animals. There would be no unavoidable and significant adverse impacts. Potential impacts related to spills are addressed in Chapter 4, *Environmental Health and Safety*.

3.6 Energy and Natural Resources

The availability and conservation of energy and nonrenewable natural resources[1] are important factors to consider when implementing a large project, such as the proposed action. Construction, operations, and transportation to and from the project site would require the consumption of electricity, natural gas, fuel, and other natural resources. General information related to sources and consumption of crude oil is addressed in Chapter 5, *Extended Rail and Vessel Transport*.

This section describes energy and natural resources in the study area, including electricity, natural gas, fuel, and nonrenewable construction materials. It then describes impacts on energy and natural resources that could result under the no-action alternative or as a result of the construction and routine operation[2] of the proposed action. Finally, this section presents any measures identified to mitigate impacts of the proposed action and any remaining unavoidable and significant adverse impacts.

3.6.1 What is the study area for energy and natural resources?

The study area for energy and natural resources consists of the energy provider service areas that encompass the project site and sources or providers of natural resources that could be affected by energy and natural resource consumption resulting from construction and routine operation at the project site. The study area also includes energy and natural resources used during routine rail transport along the Puget Sound & Pacific Railroad (PS&P)[3] rail line and vessel transport through Grays Harbor out to 3 nautical miles from the mouth of the harbor.

3.6.2 What laws and regulations apply to energy and natural resources?

No federal, state, or local laws or regulations pertaining to the use of energy and natural resources apply to the proposed action or industrial facilities. The Washington State Energy Code (Chapter 51-11C, Washington State Administrative Code [WAC]), adopted pursuant to Chapter 19.27A.020, requires a minimum level of energy efficiency but allows flexibility in building, design, construction, and heating equipment efficiencies for commercial and residential buildings.

3.6.3 How were impacts on energy and natural resources evaluated?

This section describes the sources of information and methods used to evaluate impacts.

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[1] Resources that, once consumed, cannot be replaced.

[2] Chapter 4, *Environmental Health and Safety*, addresses the potential impacts from increased risk of accidents (e.g., storage tank failure, train derailments, vessel collisions) and related consequences (e.g., release of crude oil or other proposed bulk liquids).

[3] The PS&P rail line refers to the rail line between Centralia and the project site.

3.6.3.1 Information Sources

The following sources provided information on existing energy resources and consumption.

- Grays Harbor Public Utility District (PUD)
- Grays Harbor County
- Imperium Terminal Services
- U.S. Energy Information Administration

3.6.3.2 Impact Analysis

Energy Consumption

Energy consumption was evaluated quantitatively. Potential impacts on energy were evaluated based on the estimated energy consumed during construction and onsite operation of the proposed action and the estimated change in fuel consumption from rail and vessel transport in the study area. Estimated hours of operation and types of fuel consumed were used to quantify energy consumption. The energy estimates presented for the proposed action assume implementation of the energy efficiency measures described in Chapter 2, Section 2.1.3.1, *Proposed Facilities*.

Baseline energy usage was estimated using data provided by the applicant for the highest-volume production year (2013) of the existing facility and is considered to be a conservative estimate of average annual energy usage (Drennan pers. comm.).

Natural Resource Consumption

Nonrenewable natural resource consumption was evaluated qualitatively. Potential impacts on nonrenewable natural resources were estimated based on their proposed consumption during construction of the proposed action. It was assumed that heavy construction materials, such as gravel, sand, concrete, and timber would be sourced locally to the extent possible; that quantities adequate to support the needs of the proposed action are readily available; and that long-distance transport of these materials would be undesirable due to associated transportation costs. The analysis assumed that steel used in construction would be available from a combination of local and regional sources.

3.6.4 What energy and natural resources are in the study area?

This section describes the current provision and use of energy and natural resources in the study area that could be affected by construction and routine operation of the proposed action. This section addresses energy and natural resources at the project site, along the PS&P rail line, and in and along the shoreline of Grays Harbor.

3.6.4.1 Project Site

The supply of electricity and gas to the project site, types and sources of fuel used for employee trips and maintenance vehicles, and sources and availability of natural resources that would be required for construction of the proposed action are described below.

Electricity

The project site is located in the Grays Harbor PUD electrical service area, which encompasses all of Grays Harbor County and small, adjacent areas of Jefferson, Thurston, Lewis, and Pacific Counties.

Grays Harbor PUD obtains the majority of its electricity from hydroelectric power; however, additional sources include a mix of wind, gas, biomass, and nuclear generation resources (Grays Harbor Public Utility District 2014). In 2012, Grays Harbor PUD sold 975,944 megawatt hours to 41,413 customers (U.S. Energy Information Administration 2015). Industrial customers accounted for 18% (176,342 megawatt hours) of the electricity consumption in the Grays Harbor PUD electrical service area in 2012 (U.S. Energy Information Administration 2015). Under existing conditions, the Imperium Terminal Services facility uses approximately 7,230 megawatt hours of electricity annually (Drennan pers. comm.); this represents 4% of electricity supplied by Grays Harbor PUD to industrial customers in the service area.

Grays Harbor PUD is expected to supply enough energy so that demand is balanced by supply on an average annual basis through 2034 (Grays Harbor Public Utility District 2014). The annual energy and summer peak forecasts are projected to grow at about 1% per year over the next 10 years. The utility has sufficient capacity to meet this demand because of current energy efficiency programs but will need to continue to incorporate conservation measures and new supplies to meet peak demand in the future (Pacific Northwest Utilities Conference Committee 2014).

Natural Gas

Natural gas is provided to the project site by Cascade Natural Gas. Cascade Natural Gas supplies residential, commercial, and industrial users throughout Grays Harbor County and beyond, with additional service areas throughout Washington and Oregon.

In 2013, Cascade Natural Gas supplied a total of 94.6 billion cubic feet of natural gas to residential, commercial, industrial, and electric power recipients in Washington State (U.S. Energy Information Administration 2015). Of that total, 45.3 billion cubic feet, or 47.9%, were consumed by industrial uses. Under existing conditions, the Imperium Terminal Services facility uses approximately 208,300 cubic feet of natural gas annually (Drennan pers. comm.); this represents 0.0001% of the natural gas supplied by Cascade Natural Gas to industrial users in 2013.

Fuel

Existing fuel use at the project site primarily consists of employee vehicle trips to and from the project site. Employees of the existing facility use gasoline, petroleum diesel, and biodiesel fuels for their personal vehicles (Drennan pers. comm.). The applicant uses four maintenance vehicles on site that use blends of biodiesel and diesel fuels. All types of fuels used at the project site are readily available throughout the Grays Harbor vicinity.

Natural Resources

Nonrenewable natural resources in Grays Harbor County consist primarily of sand, gravel, and timber extracted from local sources. The primary consumption of these resources is likely related to construction activities, including the use of sand, gravel, and other mineral resources in support of the manufacturing of steel, aluminum, concrete, and other building materials.

Sand and gravel suppliers in the county include Northwest Rock, Inc. and Bayview Redi Mix, which are located in Aberdeen and provide crushed rock materials to customers throughout western Washington. Similarly, numerous lumber suppliers are located in the Grays Harbor vicinity, with many more in the region.

Steel and metal suppliers in Grays Harbor include Western Steel and Supply located in Aberdeen. These suppliers provide steel products to manufacturers, contractors, and other businesses locally and throughout western Washington. The nearest foundries are located in Chehalis and Tacoma, Washington, approximately 57 and 78 miles from the project site, respectively.

3.6.4.2 PS&P Rail Line

Along the PS&P rai l line, freight locomotives are primarily powered by diesel fuel. As of 2013, 88.22 million gallons of diesel fuel were sold annually to railroad-related uses in Washington State (U.S. Energy Information Administration 2015). This represents approximately 9% of total diesel sales for all uses in the state.

3.6.4.3 Grays Harbor

Tank vessels (tankers and tank barges) transiting through Grays Harbor primarily use marine distillate fuel oil. In 2013, sales volume of marine distillate fuel oil was 60.87 million gallons for Washington State (U.S. Energy Information Administration 2015).

3.6.5 What are the potential impacts on energy and natural resources?

This section describes the use of energy and natural resources that could occur in the study area. Potential impacts of the no-action alternative are described first, followed by the potential impacts of the proposed action.

3.6.5.1 No-Action Alternative

Under the no-action alternative, impacts on energy and natural resource use related to construction of the proposed action would not occur. The applicant would continue to operate its existing facility as described in Chapter 2, Section 2.1.2.2, *Existing Operations* Annual onsite energy use under the no-action alternative would remain similar to existing energy use in the study area, described in Section 3.6.4.1, *Project Site*. Offsite transport, including transport of bulk liquids (e.g., vegetable oil, methanol, biodiesel, and glycerin) also would be similar to transport described for existing operations (Chapter 2, Section 2.1.2.2, *Existing Operations*), although the mode of offsite transport would depend on market conditions and would vary from year to year. Although the proposed action would not occur, it is assumed that growth in the region would continue under the no-action alternative, which could lead to development of another industrial use at the project site within the 20-year analysis period (2017 to 2037). Such development could result in energy and natural resource use similar to what is described for the proposed action.

3.6.5.2 Proposed Action

This section describes the impacts that could occur in the study area as a result of construction and routine operation of the proposed action. First, this section describes impacts from construction of

the proposed action. It then describes impacts of routine operation at the project site and of routine rail and vessel transport to and from the project site.

Construction

The proposed action would be constructed of manufactured materials that require energy and natural resources to produce. Energy also would be consumed transporting these materials to the project site. Further, energy would be used to operate onsite construction equipment. The proposed action's energy consumption during construction would be primarily in the forms of electricity, natural gas, and fuel.

Energy

During construction of the proposed action, electricity would be consumed to provide temporary construction site lighting, to heat buildings, and to power tools and equipment. Consumption of natural gas is not anticipated. A temporary increase in fuel usage would result from the transport of employees and materials to the project site and for the operation of construction equipment. During construction, total running time of construction equipment using biodiesel is estimated to be 20,457 hours, while total running time of equipment using gasoline is estimated to be 120 hours. Diesel fuel is not anticipated to be used for the construction equipment. Biodiesel consumed during construction would be supplied on site by Imperium Terminal Services, while the demand for gasoline needed to fuel construction equipment is anticipated to be met by existing local supply.

Natural Resources

Nonrenewable natural resources consumed during the construction of the proposed action would include sand, aggregates, and gravel for concrete in the construction of storage tank and rail loading/unloading containment areas and building foundations. Aggregates and gravel would also be used as general fill material and in asphalt to pave surfaces. Steel would be used in the construction of storage tanks, pipelines, new buildings, the marine vapor combustion unit, and rail spurs. Timber and concrete would be used for buildings and for railroad ballasts on the rail spurs.

Estimates for the construction materials required to construct the proposed action are not available at this stage; however, the quantities are anticipated to be met by existing regional supply, as described for natural resources in Section 3.6.4.1, *Project Site*.

Operations

This section describes impacts that would occur as a result of routine operations at the project site, rail transport along the PS&P rail line, and vessel transport through Grays Harbor.

Onsite

Electricity

Operation of the proposed action would contribute to the existing electrical consumption at the project site to heat and light indoor and outdoor areas and to power pumps, equipment, control systems, and storage tank heaters. Peak power consumption is expected to occur during vessel loading and would be less than 1 megawatt per loading event (Drennan pers. comm).

Estimated annual electricity usage related to onsite operation of the proposed action would be approximately 2,500 megawatt hours, an increase of approximately 35% more than existing usage (Drennan pers. comm.). This amount represents approximately 1.4% of the total electricity supplied to industrial users in the Grays Harbor PUD service area based on 2012 data. The demand is anticipated to be met by existing regional supply, as described in Section 3.6.4.1, *Project Site*.

Natural Gas

During operation, natural gas would be used to power the marine vapor combustion unit, which would be used to incinerate hydrocarbon vapors displaced during loading of tank vessels. The amount of natural gas that would be needed to operate the unit would vary depending on the loading rate and volatility/energy content of the material being loaded. Less natural gas would be needed when loading liquids with high vapor pressures, such as light crude oil, than would be needed for those with low vapor pressures, such as methanol.

At maximum throughput, the marine vapor combustion unit would use approximately 121 million cubic feet of natural gas[4] annually, 0.27% of the total natural gas supplied by Cascade Natural Gas to industrial users in 2013. Natural gas usage under the proposed action is expected to be met by forecast regional supply.

Fuel

During operations, two additional maintenance vehicles using blends of biodiesel and diesel would be needed under the proposed action at maximum throughput (Drennan pers. comm.). In addition, annual employee vehicle round trips would increase by 6,100 to 8,600 round trips, for a total of 16,425 to 18,250 round trips under the proposed action (Drennan pers. comm.). The increase in fuel consumption associated with the incremental increase in vehicle trips under the proposed action is anticipated to be met by existing local fuel supply.

Rail

At full capacity, the proposed action would result in a maximum of 730 unit train trips[5] per year, representing a diesel fuel consumption of 321,711 gallons per year. This estimated annual consumption represents less than 1% of total diesel fuel sales to railroad-related uses in Washington State during 2013. The demand for diesel under the proposed action is anticipated to be within regional planning assumptions, as described in Section 3.6.4.2, *PS&P Rail Line*, and would be met by regional supply.

Vessel

Under the proposed action, all tank vessels would likely use marine distillate fuel with less than 1,000 parts per million of sulfur (40 Code of Federal Regulations [CFR] 80.1). At full capacity, the proposed action would result in a maximum of 400 tank vessel trips[6] per year, representing marine distillate fuel consumption of approximately 167,138 gallons per year. This estimated annual

[4] Calculated based on continuous operation of two pilots (at 2 cubic feet per minute) and combustion unit operation of 2,000 hours per year (1,003 cubic feet per minute natural gas) (Olympic Region Clean Air Agency 2013).
[5] A trip represents one-way travel; in other words, an inbound trip and an outbound trip represent two trips.
[6] A trip represents one-way travel.

consumption represents approximately 0.27% of the total marine distillate fuels sales in Washington State during 2013. The demand for marine distillate fuel under the proposed action is anticipated to be within regional planning assumptions, as described in Section 3.6.4.3, *Grays Harbor*, and would be met by regional supply.

3.6.6 What required permits and plans apply to energy and natural resources?

No required permits or plans apply to energy and natural resources.

3.6.7 What mitigation measures would reduce impacts on energy and natural resources?

This section describes voluntary measures, design features, and applicant mitigation that would reduce impacts on energy and natural resources from construction and routine operation of the proposed action.

3.6.7.1 Voluntary Measures and Design Features

The following voluntary measures and design features would reduce impacts on energy and natural resources.

- To minimize energy use, the applicant will employ the most energy-efficient systems for all pumps, motors, electrical equipment, and process technology equipment as practicable.
- To minimize energy use, the applicant will apply U.S. Green Building Council Leadership in Energy and Environmental Design (LEED) Silver Standards to the design of new buildings.

3.6.7.2 Applicant Mitigation

Impacts resulting from the proposed action are considered low and would not necessitate mitigation that exceeds the minimum requirements specified by applicable laws and regulations.

3.6.8 Would the proposed action have unavoidable and significant adverse impacts on energy and natural resources?

Implementation of the voluntary measures and design features described above would reduce impacts on energy and natural resources. There would be no unavoidable and significant adverse impacts.

3.7 Noise and Vibration

Sound is a fundamental component of daily life. When sounds are perceived as desired, beneficial, or otherwise pleasing, they are typically considered as having a positive effect on daily life. When sounds are perceived as unpleasant, unwanted, or disturbingly loud, they are considered noise. Noise may interfere with a broad range of human activities in a way that degrades public health and welfare, important activities such as communication or sleep. Noise disturbance varies depending on the conditions and on the particular land uses and activities near the sound source and the sensitivity of those land uses.

Vibration is a motion described in terms of displacement, velocity, or acceleration. In contrast to airborne noise, ground-borne vibration is not a phenomenon that most people experience every day because background vibration usually well below the threshold of perception. People are usually sensitive to perceptible vibration. An increase in noise or vibration can affect the peacefulness, serenity, and sacredness of residential, commercial, recreational, and cultural locations.

This section describes noise and vibration in the study area. It then describes impacts on noise and vibration that could result under the no-action alternative or as a result of the construction and routine operation[1] of the proposed action. Finally, this section describes potential measures to mitigate impacts of the proposed action and any remaining unavoidable and significant adverse impacts.

3.7.1 What is the study area for noise and vibration?

The study area for noise and vibration consists of sensitive receptors near the project site that could be affected by noise and vibration from construction and routine operation. The study area also includes sensitive receptors that could be affected during routine rail transport along the Puget Sound & Pacific Railroad (PS&P)[2] rail line and vessel transport through Grays Harbor out to 3 nautical miles from the mouth of the harbor.

3.7.2 What laws and regulations apply to noise and vibration?

Laws and regulations for determining potential impacts on noise and vibration are summarized in Table 3.7-1. More information about these laws and regulations is provided in Appendix B, *Laws and Regulations*.

[1] Chapter 4, *Environmental Health and Safety*, addresses the potential impacts from increased risk of accidents (e.g., storage tank failure, train derailments, vessel collisions) and related consequences (e.g., release of crude oil or other proposed bulk liquids).
[2] The PS&P rail line refers to the rail line between Centralia and the project site.

Table 3.7-1. Laws and Regulations for Noise and Vibration

Laws and Regulations	Description
Federal[3]	
EPA Railroad Noise Emission Standards (40 CFR 201) and FRA's Railroad Noise Emission Compliance Regulations (49 CFR 210)	Govern railroad noise levels at the source, specify noise level limits for locomotives and rail cars.
State	
Maximum Environmental Noise Levels (WAC 173-060)	Sets standards for permissible noise levels. However, surface carriers engaged in interstate commerce by railroad are exempt from these regulations.
Local	
Hoquiam: Public Noise Nuisances (HMC 3A.30)	Defines local noise ordinances, including those for construction.

EPA = U.S. Environmental Protection Agency; FRA = Federal Railroad Administration; CFR = Code of Federal Regulations; WAC = Washington Administrative Code; HMC = Hoquiam Municipal Code.

3.7.3 How were noise and vibration impacts evaluated?

This section describes the sources of information and methods used to evaluate impacts.

3.7.3.1 Information Sources

Noise-sensitive receptors were identified around the project site and along the PS&P rail line by survey of aerial orthophotography and development of geographic information system (GIS) data.

The following sources of input and information on construction equipment, facility operations, and railroad and vessel operations were incorporated into the analysis.

- Types of anticipated construction equipment.
- Distances from construction activity to residential areas.
- General noise characteristics of onsite operational equipment.
- PS&P line train operational data and number of trips.
- Vessel operational data and number of trips.
- Ambient noise monitoring data collected along the PS&P rail line.

3.7.3.2 Impact Analysis

The methods for the noise and vibration impact analysis are described as follows.

Noise

For construction on site and for rail operations along the PS&P rail line, Federal Railroad Administration (FRA)-adopted noise assessment methods developed by the Federal Transit

[3] No federal regulations are applicable to noise from onsite construction or operation of the proposed action, FRA/FTA noise and vibration analysis methods were used for informational purposes.

Administration (FTA) were used to calculate potential noise impacts. These methods are documented in the *Transit Noise and Vibration Impact Assessment* (FRA/FTA Manual) (Federal Transit Administration 2006). FRA generally relies on this manual for analysis of potential noise impacts from construction activities and the analysis of noise from conventional rail vehicles traveling at speeds below 90 miles per hour (Federal Railroad Administration 2012). To supplement guidance in the FRA/FTA Manual, freight rail source levels from the FRA *High Speed Ground Transportation Noise and Vibration Assessment* were used to characterize noise from freight rail vehicles (Federal Railroad Administration 2012).

Construction noise was assessed using the methods outlined in the FRA/FTA Manual. Construction noise levels for each type of equipment were determined at a distance of 50 feet from the source. These values were compared to the FRA/FTA Manual 30-day construction noise threshold to qualitatively assess the likelihood that construction activities for the proposed action would affect sensitive receptors around the project site.

Per the FRA/FTA Manual, noise impacts from increase rail traffic are determined by the increase in ambient noise level (day-night average sound level [L_{dn}][4] or hourly equivalent sound level [L_{eq}[5]],) depending on the type of receptor). The amount of increase that is acceptable depends on the existing ambient noise level. To establish the existing ambient noise level along the PS&P rail line, ambient noise data were collected during short-term and 24-hour intervals between March 28 and April 27, 2015.

FRA/FTA Manual noise impact criteria are based on the land use category of the receiving properties. The FRA/FTA Manual identifies three land use categories for assessing potential noise impacts.

- **Category 1**: Tracts of land where quiet is an essential element of their intended purpose, such as outdoor amphitheaters, concert pavilions, and national historic landmarks with significant outdoor use.
- **Category 2**: Residences and buildings where people normally sleep, including homes, hospitals, and hotels.
- **Category 3**: Institutional land uses (schools, places of worship, libraries) that are typically available during daytime and evening hours. Other uses in this category can include medical offices, conference rooms, recording studios, concert halls, cemeteries, monuments, museums, historical sites, parks, and recreational facilities.

Noise exposure values are reported as hourly equivalent sound level (L_{eq}[h]) for Category 1 and 3 land uses, and L_{dn} for residential land uses (Category 2).

A GIS survey was conducted to identify noise-sensitive land uses within approximately 500 feet of the PS&P rail line and within 1,000 feet of grade crossings (where the rail line and roadway cross at the same grade; no underpass or overpass) that could be subject to noise impacts from train horns. Although all developed land uses were evaluated, the focus of this study was on outdoor locations with frequent human use and façades of residential buildings where people normally sleep

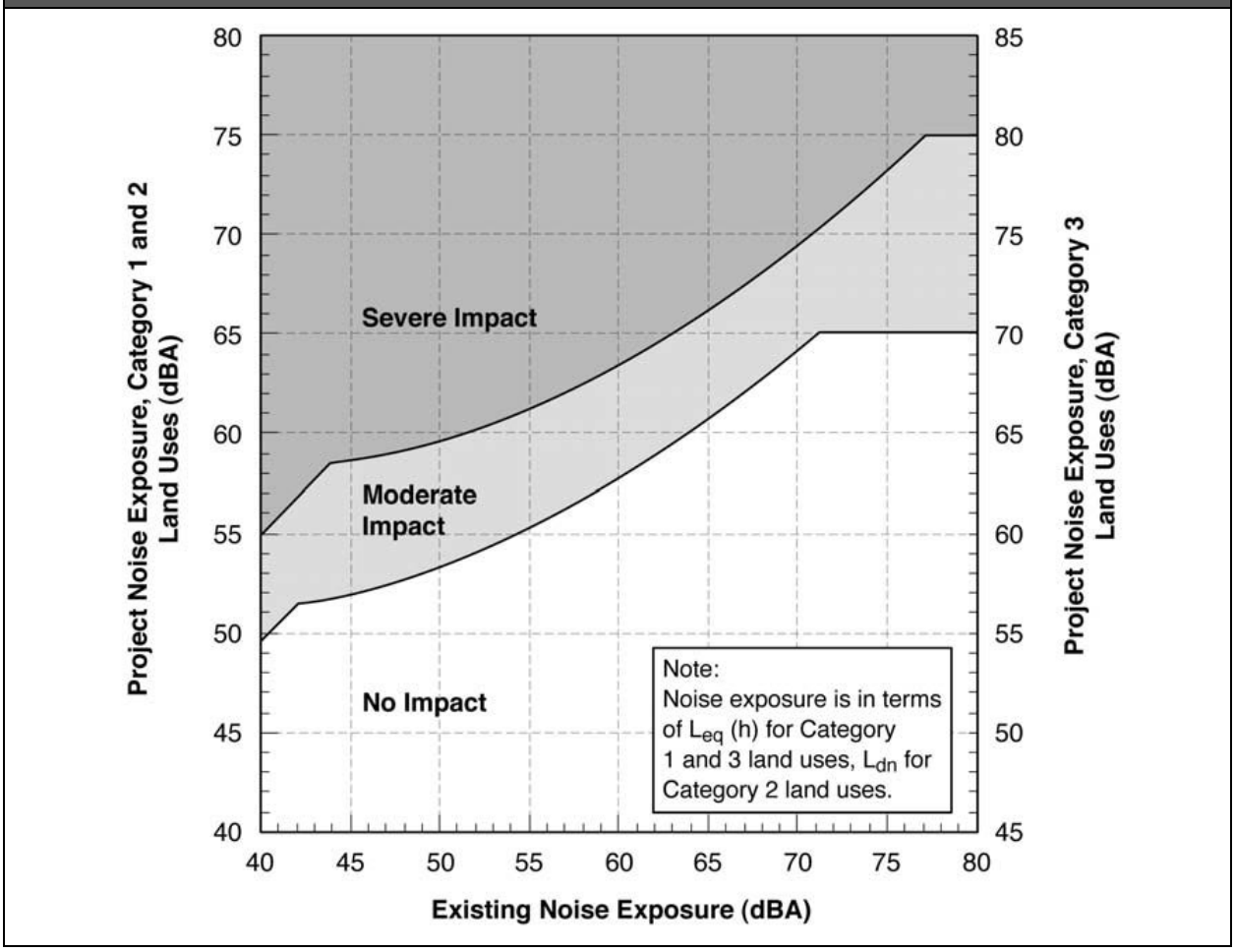
[4] The day-night sound level (L_{dn}) is essentially a 24-hour average noise level (in A-weighted decibels [dBA]) with a 10-decibel upward adjustment of noise levels occurring at night. This adjustment is made to account for most peoples' increased sensitivity to noise at night.

[5] The L_{eq}(h) a noise metric representing a constant sound level containing the same sound energy as the actual fluctuating sound over an hour. As such, the L_{eq} can be considered an energy-average sound level.

(Category 2 land uses). Commercial and industrial land uses were not included because most of these land uses are compatible with higher noise levels.

The FRA/FTA Manual defines two levels of potential impact, *moderate impact* or *severe impact*. The level of impact is determined by the existing level of noise exposure and the change in noise exposure that would result from a proposed action using a sliding scale according to the land uses affected. Noise impacts are assessed by comparing the existing outdoor noise exposure with future project-related outdoor noise levels, as illustrated in Figure 3.7-1. The criterion for each degree of impact is based on a sliding scale that is dependent on the existing noise exposure and noise exposure with the proposed action. As the existing level of noise exposure increases, the additional noise exposure causing a moderate or severe impact decreases.

Figure 3.7-1. FRA/FTA Manual Noise Impact Criteria



Source: Federal Transit Administration 2006.

The noise impact categories are as follows.

- **No impact.** The change in the noise level would result in an insignificant increase in the number of instances where people are highly annoyed by new noise.
- **Moderate impact.** The change in the noise level would be noticeable to most people but may not be enough to cause strong adverse community reactions.

- **Severe impact.** A significant percentage of people would be highly annoyed by the noise.

The contribution of the proposed action relative to the existing noise levels (Figure 3.7-1) would differ according to the level of existing noise exposure. This sliding scale recognizes that people who are already exposed to high levels of noise in the ambient environment are expected to tolerate smaller increases in noise in their community relative to locations with lower existing ambient levels. For example, a proposed action-related exposure of 55 dBA L_{dn} would result in no impact on a receptor with an existing noise exposure of 55 dBA L_{dn}. However, a proposed action-related exposure of 70 dBA L_{dn} would result in a severe impact for a receptor with an existing noise exposure of 70 dBA L_{dn}.

A general assessment-level analysis identified in the FRA/FTA Manual was conducted to compute noise from the increased rail traffic related to the proposed action at maximum throughput. Unlike passenger trains, freight trains do not run on a schedule. U.S. railroads evaluate each situation and dispatch trains based on a number of criteria, including available crew, number of cars, cost of fuel, and overall revenue. For this reason, rail events under the proposed action were assumed to be evenly distributed over a 24-hour day. Rail vehicles were assumed to operate at a speed of 25 miles per hour. Calculated noise levels associated with the proposed action trains were then compared with the moderate impact and severe impact criteria according to the existing ambient conditions recorded for a given sensitive receptor location. FRA/FTA Manual methods were then used to calculate the distances for moderate and severe impacts from the PS&P rail line to locations of moderate and severe impact. Residential structures and associated outdoor use areas in impact zones were counted using GIS analysis methods.

Noise generated from onsite operation of the proposed action was qualitatively compared to noise from existing operations.

Vessel noise levels were estimated by using measurements of vessel noise for both docked vessels and vessels underway. Measured vessel noise levels were extrapolated to distances to sensitive receptors. Calculated vessel noise levels were compared with calculated existing vessel noise levels to determine the relative magnitude of increased noise levels.

Vibration

Data and information provided in the *Transit Noise and Vibration Impact Assessment* (Federal Transit Administration 2006) were used to analyze the potential vibration impacts from construction of the proposed action, routine operations on site, and proposed action rail traffic along the PS&P rail line.

3.7.4 What sensitive receptors are in the study area?

This section provides a general description of the noise and vibration sensitive receptors in the study area that could be affected by construction and routine operation of the proposed action. This section describes sensitive receptors located near the project site, along the PS&P rail line, and in and along the shoreline of Grays Harbor.

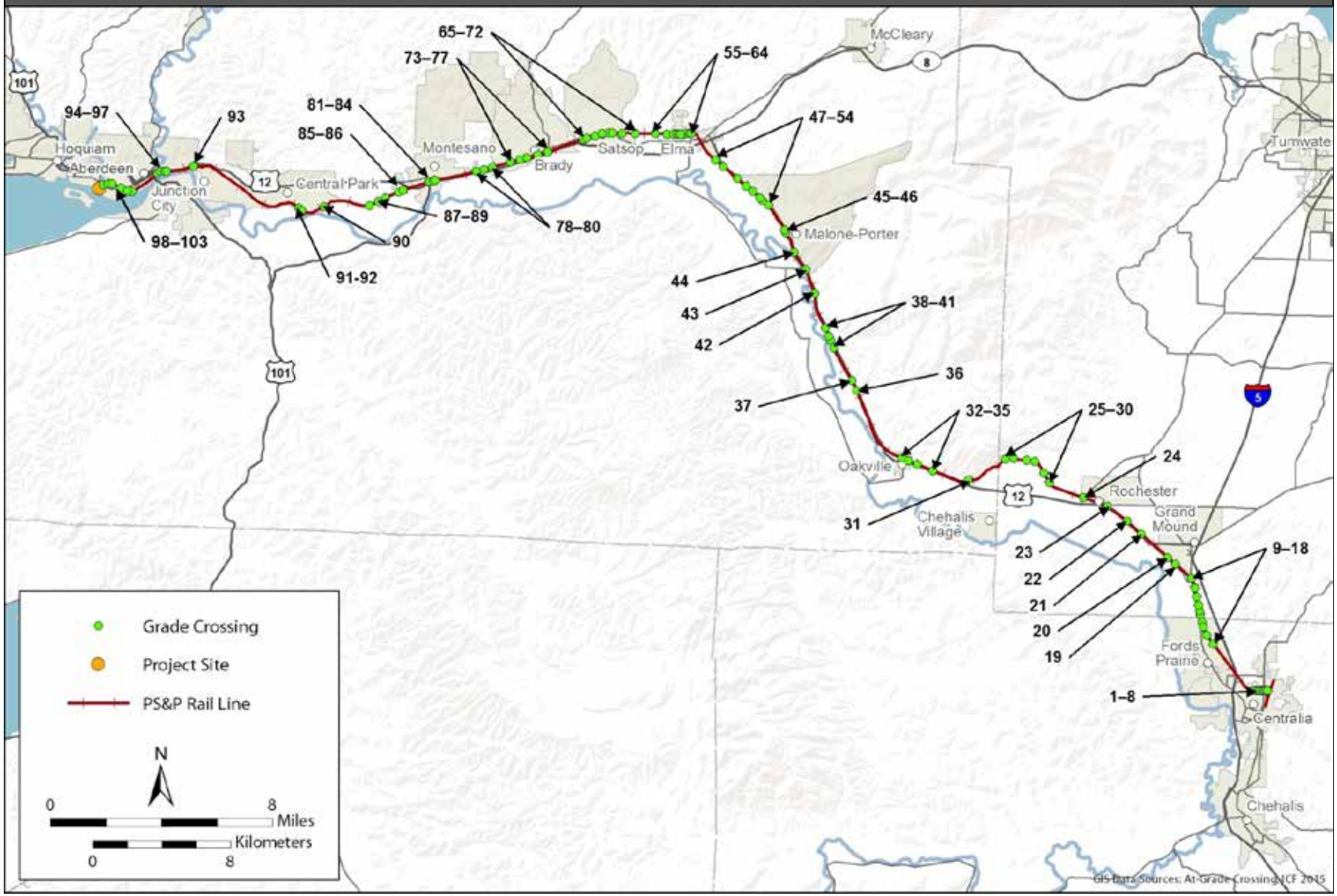
3.7.4.1 Project Site

Sensitive receptors near the project site include residences approximately 1,500 feet northeast from the project site.

3.7.4.2 PS&P Rail Line

The PS&P rail line crosses through several population centers and rural areas with varying densities of sensitive receptors between Centralia and the project site. Locations of grade crossings on the PS&P rail line are shown in Figure 3.7-2.

Figure 3.7-2. PS&P Rail Line Grade Crossings



As described in Section 3.7.3.2, *Impact Analysis*, the focus of this analysis was on residential land uses. Section 3.8, *Land and Shoreline Use*, describes the general land uses along the PS&P rail line. In summary, both the more densely populated areas and rural areas of the PS&P rail line include residential land uses, including residences near grade crossings. The PS&P rail line was subdivided into 10 segments according to land use characteristics and major nearby roadways to assess potential impacts. A summary of the analysis segments and the land use characteristics within each segment is shown in Table 3.7-2.

Table 3.7-2. Analysis Segments and Land Use Characteristics along the PS&P Rail Line[a]

Analysis Segment	Location	PS&P Rail Line Grade Crossing	General Land Use Characteristics	Distance From Rail to Receptor[b]
A	Centralia	1–8	Higher-density single family residential and commercial	45 feet
B	Unincorporated Centralia, Rochester (south of US Route 12)	9–20	Single-family residential and commercial	60 feet
C	Rochester (between US Route 12 and Littlerock Road SW)	21–24	Single-family residential and commercial	100 feet
D	Rochester (west of Littlerock Road SW)	25–30	Single-family residential and commercial	80 feet
E	Oakville	31–42	Lower-density single-family residential and commercial	80 feet
F	Malone-Porter	43–54	Lower-density single-family residential	50 feet
G	Elma-Satsop	55–72	Medium-density single-family residential	45 feet
H	Montesano	73–84	Medium-density single-family residential	45 feet
I	west of Montesano/east of Aberdeen	85–92	Medium-density single-family residential	50 feet
J	Aberdeen	93–103	Single-family residential and commercial	70 feet

[a] Additional information provided in Appendix G, *Noise Data*.
[b] Closest distance of a sensitive receptor from the centerline of the PS&P rail line.

3.7.4.3 Grays Harbor

The nearest sensitive receptor close to vessel activity at the Terminal 1 dock is a residential area approximately 2,900 feet to the northeast. The sensitive receptor (residential area) nearest to the Grays Harbor Navigation Channel is located approximately 1,800 feet away from vessel routes.

3.7.5 What is the existing noise and vibration environment in the study area?

This section describes the existing noise and vibration environment in the study area.

3.7.5.1 Noise

Existing noise sources at the project site are routine operations (including switching operations from the delivery and release of rail cars), operations at adjacent industrial facilities, operations from other industrial facilities in the Port of Grays Harbor area, vehicular traffic from Industrial Road and other nearby roadways, and occasional aircraft overhead. Existing noise sources around the Grays Harbor area includes noise generated by vessel operations, the natural environment including birds, and occasional aircraft overhead.

A field noise study was conducted to characterize existing ambient noise levels at sensitive receptors along the PS&P rail line. Long-term measurement sites were selected to capture daily noise level patterns and statistics continuously over 1-hour intervals. Day-night noise levels in terms of L_{dn} were calculated from hourly sound level data. Short-term measurement locations were selected to supplement the long-term measurements at surrounding land uses. These measurements were 10 minutes in duration and were attended by an observer to characterize noise levels based on audible sources during measurement intervals.

The average noise level ranged from 62 L_{dn} to 81 L_{dn} (Table 3.7-3). The most dominate sources in the study area are wayside and horn noise[6] from rail events on the PS&P rail line, automobile and truck traffic on highways such as Interstate 5, US Route 12 (US 12), State Route 8 (SR 8), infrequent automobile and truck traffic on local roads, and light industrial noise. A summary of long-term measurements is shown in Table 3.7-3. Technical noise survey reports are included in Appendix G, *Noise Data*.

Table 3.7-3. Noise Levels at Long-Term Monitoring Locations

Location	Analysis Segment	Approximate Distance from PS&P Rail Line Centerline	Range of L_{dn} Values Measured	Average L_{dn} Value	Observed Noise Sources	Time of Measurement
1023 B Street, Centralia	A	50	72 to 86	81	PS&P rail line, frequent traffic on local roads	12:00 a.m. April 4 to 12:00 a.m. April 10, 2015
1102 G Street, Centralia	A	45	72 to 83	80	PS&P rail line, frequent traffic on local roads	12:00 a.m. April 4 to 12:00 a.m. April 10, 2015
1103 J Street, Centralia	A	45	71 to 82	77	PS&P rail line, frequent traffic on local roads	12:00 a.m. April 4 to 12:00 a.m. April 10, 2015
3900 Kuper Road, Centralia	B	110	70 to 74	72	PS&P rail line, frequent traffic on local roads	12:00 a.m. April 11 to 12:00 a.m. April 17, 2015
Old Hwy 9 & Tea Street SW, Rochester	B	130	68 to 74	70	PS&P rail line, frequent traffic on local roads	12:00 a.m. April 11 to 12:00 a.m. April 17, 2015

[6] Train engineers are required by FRA rules to begin to sound locomotive horns at least 15 seconds and not more than 20 seconds in advance of public grade crossings.

Location	Analysis Segment	Approximate Distance from PS&P Rail Line Centerline	Range of L_{dn} Values Measured	Average L_{dn} Value	Observed Noise Sources	Time of Measurement
19318 Grand Mound Way, Rochester	C	45	69 to 72	71	PS&P rail line,, US Route12, truck traffic	12:00 a.m. April 4 to 12:00 a.m. April 10, 2015
180th at Little Rock, Rochester	C	180	66 to 70	68	PS&P rail line, US Route 12, truck traffic	12:00 a.m. April 4 to 12:00 a.m. April 10, 2015
205 Murrey, Oakville	E	185	61 to 72	68	PS&P rail line, US Route 12, truck traffic	12:00 a.m. March 28 to 12:00 a.m. April 3, 2015
22 Evergreen Village Lane, Elma	F	260	62 to 73	70	PS&P rail line, US Route 12, truck traffic	12:00 a.m. March 28 to 12:00 a.m. April 3, 2015
513 N 13th Street, Elma	G	190	62 to 70	67	PS&P rail line, infrequent traffic on local roads, light industrial	12:00 a.m. March 28 to 12:00 a.m. April 3, 2015
502 N 13th Street, Elma	G	25	66 to 76	71	PS&P rail line, infrequent traffic on local roads, light industrial	12:00 a.m. March 28 to 12:00 a.m. April 3, 2015
57 Hurd Road, Elma	G	85	64 to 71	68	PS&P rail line, infrequent traffic on local roads, light industrial	12:00 a.m. March 28 to 12:00 a.m. April 3, 2015
510 Foss Avenue, Satsop	G	65	67 to 75	72	PS&P rail line, infrequent traffic on local roads, light industrial	12:00 a.m. March 28 to 12:00 a.m. April 3, 2015
78 Devonshire, Montesano	H	90	67 to 73	69	PS&P rail line, SR 12, truck traffic	12:00 a.m. March 28 to 12:00 a.m. April 3, 2015
140 S Chehalis Street, Aberdeen	J	230	67 to 75	72	PS&P rail line, truck traffic, local traffic, light industrial	12:00 a.m. March 28 to 12:00 a.m. April 3, 2015
2100 1st Street, Aberdeen	J	95	65 to 74	69	PS&P rail line, truck traffic, local traffic, light industrial	12:00 a.m. March 28 to 12:00 a.m. April 3, 2015

Location	Analysis Segment	Approximate Distance from PS&P Rail Line Centerline	Range of L_{dn} Values Measured	Average L_{dn} Value	Observed Noise Sources	Time of Measurement
11846 170th Avenue, Rochester	D	105	62 to 76	70	PS&P rail line, traffic on local roads	12:00 a.m. April 4 to 12:00 a.m. April 10, 2015
7220 Central Park Drive, Aberdeen	I	295	60 to 64	62	PS&P rail line, infrequent traffic on local roads	12:00 a.m. April 11 to 12:00 a.m. April 17, 2015

Source: Appendix G, *Noise Data*

3.7.5.2 Vibration

Vibration sources at the project site include the vibration created from rail car switching operations (delivery and release of rail cars), and heavy vehicles operating on Industrial Road adjacent to the project site. Vessel and other operations on the waters of Grays Harbor do not create vibration. Vibration sources along the PS&P rail line include existing train traffic (an average of 3 rail trips per day) as well as trucks and buses operating on highways and local roads.

Groundborne vibration from train passbys may intermittently cause perceptible vibration at locations directly adjacent to the PS&P rail line. Using generalized FRA/FTA Manual surface vibration data, a single passby from a locomotive-powered freight vehicle moving at 25 miles per hour would be expected to produce a vibration level of approximately 78 velocity decibels (VdB) at a distance of 50 feet, which is distinctly perceptible to humans inside of building structures. However, because rail events are infrequent as defined by the FRA/FTA Manual (fewer than 30 events per day), a vibration level of this magnitude is not considered to result in a significant "annoyed" response from people exposed to this level of groundborne vibration (Federal Transit Administration 2006). For these reasons, vibration measurements within the study area were not conducted.

3.7.6 What are the potential noise and vibration impacts?

This section describes noise and vibration impacts that could occur in the study area. Potential impacts of the no-action alternative are described first, followed by potential impacts of the proposed action.

3.7.6.1 No-Action Alternative

Under the no-action alternative, the applicant would continue to operate its existing facility as described in Chapter 2, *Proposed Action and Alternatives*. Although the proposed action would not occur, it is assumed that growth in the region would continue under the no-action alternative, which could lead to development of another industrial use at the project site within the 20-year analysis period (2017 to 2037). Such development could result in noise and vibration impacts similar to those described for the proposed action.

Existing rail traffic and associated noise from grade-crossing horns would continue at existing levels (an average of 3 rail trips per day) under the no-action alternative. As noted in Section 3.15, *Rail*

Traffic, no increase in rail traffic is anticipated over the analysis period, although train length may increase. Noise from train horns near grade crossings would still be required and would be the dominant noise source in rural areas along the PS&P rail line. The vibration generated by existing rail operations on the PS&P rail line would continue. Noise generated by existing vessel operations would also continue.

3.7.6.2 Proposed Action

This section describes the impacts that could occur in the study area as a result of construction and routine operation of the proposed action. First, this section describes impacts from construction of the proposed action. It then describes impacts of routine operation at the project site and routine rail and vessel transport to and from the project site.

Construction

Washington State maximum permissible noise level regulations (Washington Administrative Code [WAC] 173-60-040) and local noise regulations do not apply to construction noise during daytime hours. Construction of the proposed action would result in a temporary increase in noise and vibration from construction equipment operations. No nighttime construction is proposed.

Construction activities would involve the use of heavy construction equipment. Table 3.7-4 lists the construction equipment likely to be used during construction of the proposed action and associated typical noise levels, measured 50 feet away from the equipment.

Table 3.7-4. Typical Construction Equipment Noise Levels at 50 feet

Equipment	Noise Level (dBA)
Crane	88
Dozer Cat® D8 15.3 CY	85
Grader Cat® 14-H/14-foot blade	85
Dump truck 18 ton, 12 CY HWY	88
Excavator	81
Wheel loader cat 966/4.8 CY	85
Backhoe Cat® 345 99k/3 CY	80
Welder (Grp 4)	74
Genset 250 kW	81
Bobcat loader	85
Compactor, Cat® 816, 25 ton	82
Compressor, trailer 1,200 cfm	78
Light Plan/Genset, 6kW, 4/10	73

dBA = A-weighted decibel; CY = cubic yards; HWY = [on] highway; k = thousand; Grp = group; kW = kilowatt; cfm = cubic feet per minute

While construction noise associated with the equipment listed in Table 3.7-4 would likely be audible in nearby residential areas, the construction noise levels would be much lower than those listed in Table 3.7-4. These levels are based on the receptor being 50 feet from the source, while the distance of the project site to the nearest residence is approximately 1,500 feet. At this distance, noise levels from the equipment would range from approximately 42 A-weighted decibels (dBA) to 57 dBA in the adjacent residential areas. These noise levels are below the 30-day construction noise threshold

of 75 dBA L_{dn} for residential locations, as defined in the FRA/FTA Manual. Because of the relatively low level and temporary nature of construction noise, impacts from construction equipment operations on sensitive receptors would be low.

Construction of the storage tanks would require impact pile-driving. Pile-driving is expected to be the dominant noise source at the project site, compared with other construction equipment noise sources. Impact pile-driving lasting for approximately 2 to 3 months would be required for the storage tank foundations. Based on FRA/FTA Manual pile-driving noise measurement data, pile-driving noise levels would be approximately 71 dBA at the residential areas closest (approximately 1,500 feet away) to the pile-driving activity.[7] This value is lower than the 30-day construction noise threshold of 75 L_{dn} for residential locations. Therefore, noise impacts on sensitive receptors from pile-driving would be low.

Similarly, no severe pile-driving vibration impacts in the residential areas are expected because of the large distances between pile-driving activity and residential areas. For example, pile-driving vibration velocity levels would be approximately 0.0033 inch per second at the nearest residential areas 1,500 feet away. This value is below FTA's most stringent building damage criterion.[8]

Vibration levels associated with the construction equipment listed in Table 3.7-4 would also be low in the nearest residential areas, because vibration caused at the project site would be greatly reduced at the distance of the residential areas. For example, bulldozer vibration velocity levels at the nearest residence 1,500 feet away would be approximately 0.0002 inch per second, which is below most stringent building damage criterion, as documented in the FRA/FTA Manual. Effects of pile driving on aquatic species are discussed in Section 3.5, *Animals*.

Operations

This section describes impacts that would occur as a result of routine operations at the project site, rail transport along the PS&P rail line, and vessel transport through Grays Harbor.

Onsite

Onsite operations would generate noise and vibration from operations of equipment such as various pumps, compressors, and the marine vapor control unit. Loading and unloading of rail cars would also generate operational noise. Noise and vibration levels associated with these sources are expected to be similar to levels generated by other industrial sources. The City of Hoquiam noise ordinance would not apply to onsite operations.

Vessels docked at the Terminal 1 berth would be approximately 2,900 feet from the nearest residential area. Assuming a stationary vessel noise level of 65 dBA at 25 meters (European Commission 2013), vessel noise levels would be approximately 36 dBA[9] at the nearest residential area. This is a relatively low noise level and likely below ambient noise levels; therefore, no meaningful vessel noise impacts are expected.

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[7] Assuming no nighttime pile-driving, and a usage factor of 0.2 L_{dn}, the sound level would be 64 dBA. A usage factor of 0.2 is often used for impact pile-driving to account for the periodic nature of this noise source. See Federal Highway Administration *Roadway Construction Model User's Guide* (January 2006) for more information.

[8] The Federal Transit Administration's "extremely fragile historic building" damage criterion is a vibration velocity of 0.12 inch per second (2006).

[9] Note that this 36-dBA value is not expressed in terms of L_{dn}, but rather as a steady state noise level while the vehicle is docked.

Rail

Operation of the proposed action at maximum throughput would add approximately two unit train trips[10] per day on average (730 per year maximum) along the PS&P rail line to the average of approximately three train trips per day (1,235 per year) under the no-action alternative (Section 3.15, *Rail Traffic*). This increased frequency of rail traffic and the associated routine operational activities would increase noise and vibration.

Noise

Estimated noise levels with the proposed action were calculated based on the assumptions shown in Table 3.7-5.

Table 3.7-5. Railroad Operational Data Assumptions

	Existing Conditions	Proposed Action
Average trips per day	3.1 (west of Elma) 3.0 (east of Elma)	2.0
Number of locomotives per train	2.5	3
Number of cars per train	69.5	120
Speed (miles per hour)	25	25

As previously described, the focus of the noise analysis is on L_{dn} for locations where people sleep. Daytime loudest-hour noise levels (in terms of L_{eq}) were not analyzed, because the loudest hour at grade crossings and wayside locations under the proposed action would generally be characterized by a single train passby, which occurs under existing conditions.

The analysis considered two types of train noise.

- *Wayside* noise refers to the combined effect of locomotive noise and car/wheel noise.
- *Horn* noise refers to the sound of locomotive warning horns, which are sounded at public at-grade road/rail crossings. Because horn sounding is intentionally loud to warn motorists of oncoming trains, the horn noise footprint is often larger than the wayside noise footprint.

According to FRA/FTA Manual, rail noise impacts are determined by the extent to which rail traffic related to the proposed action would increase existing ambient noise levels. This relationship is nonlinear and has a lower allowable increase in noise level when existing ambient noise levels are relatively high. The number of receptors exposed to moderate or severe noise impacts by segment of the proposed action is shown in Table 3.7-6. As described previously, counts of moderate and severe impacts are based on FRA/FTA Manual general assessment methods and proposed rail events were assumed to be evenly distributed over a 24-hour day.

Table 3.7-6 presents the number and general location of noise-sensitive receptors that would be exposed to increased noise from the addition of proposed action rail trips on the PS&P line as defined by the FRA/FTA Manual. Based on the analysis, the proposed action would result in some moderate increases in wayside noise, primarily in the Elma-Satsop area, and the area west of Montesano and east of Aberdeen. This moderate increase would affect 28 receptors, 14 at each

[10] A trip represents one-way travel; in other words, an inbound trip and an outbound trip are counted as two trips.

location. As noted in Table 3.7-6, the greatest potential for substantial noise increases would occur from increased train horns sounding at grade crossings for public safety.

Table 3.7-6. Estimated Counts of Moderate and Severe Noise Impacts on the PS&P Rail Line— Proposed Action

Analysis Segment	Location	PS&P Rail Line Grade Crossing[a]	Number of PS&P Rail Line Grade Crossings	General Land Use Characteristics	Horn Noise		Wayside Noise	
					Moderate	Severe	Moderate	Severe
A	Centralia	1–8	8	Higher-density single family residential and commercial	69	0	0	0
B	Unincorporated Centralia, Rochester (south of US Route 12)	9–20	12	Single-family residential and commercial	24	1	0	0
C	Rochester (between US Route 12 and Littlerock Road SW)	21–24	4	Single-family residential and commercial	6	1	0	0
D	Rochester (west of Littlerock Road SW)	25–30	6	Single-family residential and commercial	10	0	0	0
E	Oakville	31–42	12	Lower-density single-family residential and commercial	20	0	0	0
F	Malone-Porter	43–54	12	Lower-density single-family residential	40	8	0	0
G	Elma-Satsop	55–72	18	Medium-density single-family residential	148	48	14	0
H	Montesano	73–84	12	Medium-density single-family residential	28	0	0	0
I	West of Montesano/east of Aberdeen	85–92	8	Medium-density single-family residential	26	8	14	0
J	Aberdeen	93–103	11	Single-family residential and commercial	27	0	0	0
Total					**398**	**66**	**28**	**0**

[a] See Figure 3.7-2 for the location of grade crossings.

Based on the analysis, moderate noise exposure would occur around grade crossings relatively evenly distributed along the PS&P rail line, with the most affected receptors in the Elma–Satsop area (148), followed by Centralia (69), Montesano (28), the area west of Montesano and east of Aberdeen (26), and in Aberdeen (27). A total of 398 receptors would be affected. As shown in Table 3.7-6, 66 additional receptors would be exposed to severe impacts from horn noise at grade crossings. These impacts would occur where the rail line runs closest to residential land uses. The most potentially affected receptors would be in the Elma–Satsop area, where 48 receptors would be affected.

As described previously, the increase in the average L_{dn} at each of the receptors with moderate and severe impacts per FRA/FTA Manual methods would depend on the existing noise level. As the existing level of noise exposure increases, the additional noise exposure needed to cause a moderate or severe impact decreases. On average, potentially affected receptors would generally experience an average increase in noise exposure over the course of any given day. However, as noted previously, it is not possible to predict when trains would be traveling to and from the project site. All trains would continue to travel at the same speeds and would continue to sound horns consistent with existing operational practices. As noted above, the number of events per day would increase by approximately two trips per day on average, meaning sensitive receptors would experience train horns sounding two additional times per day, on average.

Table 3.7-7 illustrates the grade crossings anticipated to be exposed to the most substantial noise increases (i.e., severe impacts as defined in the FRA/FTA Manual). The grade crossings with the most severe impacts are listed first. Proposed action-related horn and wayside noise levels and counts of noise impacts at all grade crossings are shown in Appendix G, *Noise Data*.

Table 3.7-7. Estimated Number of Receptors at Grade Crossings with Severe Noise Impacts by Magnitude of Impact

Grade Crossing[a]	PS&P Rail Line Grade Crossing	Location	Severe Impacts	Moderate Impacts
61	North 11th Street	Elma	10	16
62	North 13th Street	Elma	10	14
55	North 2nd Street	Elma	8	26
58	North 6th Street	Elma	8	6
63	North 17th Street	Elma	6	8
91	Private Crossing	Central Park	6	9
45	Private Crossing	Malone-Porter	4	16
46	Private Crossing	Malone-Porter	2	8
47	Dunlap Road	Malone-Porter	2	2
56	North 3rd Street	Elma	2	0
57	North 5th Street	Elma	2	4
60	North 10th Street	Elma	2	6
85	County Farm Road	Montesano	2	12
16	216th Avenue SW	Centralia	1	4
23	183rd Avenue SW	Rochester	1	2
Total:			**66**	**133**

[a] See Figure 3.7-2 for location of grade crossings.

As shown in Table 3.7-7, 48 of the 66 receptors (73%) exposed to severe impacts are located in Elma. Other locations with receptors exposed to severe impacts are located in the Central Park area (east of Aberdeen; six receptors), Malone-Porter area (southeast of Elma; eight receptors), Montesano (two receptors), Rochester (one receptor), and Centralia (one receptor).

In addition to the severe impacts shown in Table 3.7-7, the eight grade crossings located in central Centralia have very high levels of existing surface transportation noise exposure at densely populated clusters of receptors along the PS&P rail line, many of which are located approximately 50 feet from the existing track and currently experience ambient levels as high as 81 dBA L_{dn}. Therefore, the moderate impacts at these receptors are called out separately in Table 3.7-8.

Table 3.7-8. Estimated Number of Receptors at Grade Crossings with Moderate Noise Impacts in Central Centralia

Grade Crossing[a]	PS&P Rail Line Grade Crossing	Location	Severe Impacts	Moderate Impacts
1	B Street	Centralia	0	12
2	North Tower Avenue (SR 507)	Centralia	0	6
3	North Pearl Street (SR 507)	Centralia	0	6
4	E Street	Centralia	0	8
5	F Street	Centralia	0	8
6	G Street	Centralia	0	6
7	H Street	Centralia	0	8
8	J Street	Centralia	0	15
Total			**0**	**69**

[a] See Figure 3.7-2 for location of grade crossings.

Noise from surface carriers engaged in interstate commerce by railroad is exempt from Washington State maximum permissible noise level regulations. While noise barriers or building sound insulation could provide ways to reduce project related noise exposure for some receptors, elimination of locomotive horn sounding at the affected grade crossings would eliminate and not just reduce increased horn noise. The FRA Final Train Horn Rule (49 CFR 222) provides a safe and effective way to reduce locomotive horn noise through implementation of quiet zones. Quiet zones are areas in which horns are not required to be sounded as long as FRA safety requirements are met. Quiet zones can be established using a procedure established in FRA regulations through installation of enhanced safety measures at grade crossings such that train horns would not be required to be used. Implementation of each quiet zone requires cooperation by all applicable jurisdictions and is contingent on approval by FRA. Section 3.7.8.2, *Applicant Mitigation,* identifies mitigation for the applicant to coordinate with affected communities the creation of quiet zones for areas where noise from proposed action rail traffic would have the most severe noise impacts (Table 3.7-7). Additional factors to consider include the number of receptors affected, the effectiveness of the quiet zone, community views, and the extent to which ambient levels are already heavily influenced by noise from surface transportation.

Vibration

Vibration related to PS&P rail traffic is evaluated based on peak passby vibration level. Unlike noise, vibration impacts do not increase with increased train traffic unless the existing line is a heavily used rail corridor with more than 12 trains per day (Federal Transit Administration 2006). With the

addition of proposed action trains, an average of approximately 5 trips would occur on the PS&P line daily. Because peak passby vibration levels are primarily a function of train speed, and train speeds are not expected to increase as the result of the proposed action, negligible rail vibration impacts are expected compared to the no-action alternative.

Vessel

Operation of the proposed action at maximum throughput would result in an average of approximately one tank vessel trip per day (a maximum of 400 per year[11]) along the navigation channel compared to the 436 large commercial vessel[12] trips under the no-action alternative (Section 3.17, *Vessel Traffic*). This increased traffic and associated routine operations could result in increased noise levels.

Vessels underway through the navigation channel pass by residences as close as 1,800 feet. Assuming a vessel noise level of 75 dBA at 25 meters (European Commission 2013) and a speed of 15 miles per hour, the sound exposure level[13] of a vessel passby would be 88 dBA at 25 meters. Using baseline existing vessel traffic of 1.2 trips per day, the corresponding L_{dn} value at the nearest residences would be approximately 20 dBA. The proposed action would increase vessel traffic to an average of approximately 2.3 trips per day, resulting in L_{dn} of approximately 30 at the nearest residences. Since this increase in noise level is minor, and because these L_{dn} values are far below ambient L_{dn} values typical for neighboring land uses, negligible noise impacts are expected from vessels underway.

3.7.7 What required permits and plans apply to noise and vibration?

No required permits or plans apply to noise and vibration.

3.7.8 What mitigation measures would reduce noise and vibration impacts?

This section describes the applicant mitigation measures that would reduce noise and vibration impacts from construction and routine operation of the proposed action.

3.7.8.1 Applicant Mitigation

The applicant will implement the following mitigation.

- To reduce construction noise at nearby sensitive receptors, the applicant will maintain construction and maintenance equipment in good working order with properly functioning mufflers to control noise.
- To address increased noise from rail traffic, the applicant will coordinate with PS&P and interested communities along the PS&P rail line on the creation of quiet zones, if requested.

[11] Proposed vessel trips are total for the facility so are not in addition to trips attributable to the applicant under the no-action alternative (approximately 14 per year).
[12] The term *large commercial vessels* refers collectively to tank and cargo vessels.
[13] Sound exposure level normalizes the sound energy of a noise event as if it occurred in 1 second. The sound exposure level is used to compare two different noise events to each other and is also used to compute the L_{dn}.

Elimination of locomotive horn sounding at the affected grade crossings would eliminate impacts from increased horn noise. Quiet zones can be established using a procedure established in FRA regulations. The quiet zone allows the installation of enhanced safety measures at grade crossings such that train horns would not be required to be used. Implementation of a quiet zone is subject to FRA approval. Quiet zones include measures to maintain the level of safety while reducing noise.

3.7.9 Would the proposed action have unavoidable and significant adverse noise and vibration impacts?

Unavoidable and significant adverse impacts are described as follows for noise and vibration.

3.7.9.1 Noise

Implementation of the proposed action would result in increased rail traffic that could cause substantial increases in noise along the PS&P rail line, depending on the specific location. This could result in noise increases that meet the FRA/FTA criteria for severe impacts on sensitive receptors. These increases could occur near 15 grade crossings, representing approximately 66 total receptors and up to approximately 10 receptors affected at any one grade crossing. These severe noise impacts would be from train horn noise that is intended for public safety. In central Centralia, the proposed action would add noise to an existing noisy environment and cause moderate impacts per FRA/FTA Manual criteria. As described previously, railroad noise is exempt from Washington State and local noise limits; however, it is possible for communities to work with the FRA to apply for a quiet zone to limit train horn sounding. As noted in Section 3.7.8.2, *Applicant Mitigation*, the applicant will work with PS&P and interested parties to this end. However, as long as train horns continue to sound for safety at the grade crossings listed in Table 3.7-7, the potential for exposure to severe noise increases at these 15 grade crossings would remain. There would be no unavoidable and significant adverse impacts related to onsite construction or operation or vessel transport.

3.7.9.2 Vibration

The addition of proposed action trains to the PS&P line would have negligible rail vibration impacts. Therefore, there would be no unavoidable and significant adverse vibration impacts.

3.8 Land and Shoreline Use

Land use refers to how land is developed for various human uses, including residential, commercial, and industrial uses. It also refers to the preservation or protection of land for natural uses. Shorelines—land along a water body—can also be developed for human purposes or preserved for natural purposes. Large development projects, such as the proposed action, must be compatible with surrounding land uses and must comply with all state and local regulations and policies governing land and shoreline use.

This section describes land and shoreline use in the study area, including zoning and applicable permits. It then describes impacts on land and shoreline use that could result under the no-action alternative or as a result of the construction and routine operation[1] of the proposed action. Finally, this section presents any measures identified to mitigate impacts of the proposed action and any remaining unavoidable and significant impacts.

3.8.1 What is the study area for land and shoreline use?

The study area for land and shoreline use consists of the land on and near the project site that could be affected by construction and routine operation at the project site. The study area also includes land and shoreline that could be affected during routine rail transport along the Puget Sound & Pacific Railroad (PS&P)[2] rail line and vessel transport through Grays Harbor out to 3 nautical miles from the mouth of the harbor.

3.8.2 What laws and regulations apply to land and shoreline use?

Laws and regulations for determining potential impacts on land and shoreline use are summarized in Table 3.8-1. More information about these laws and regulations is provided in Appendix B, *Laws and Regulations*, and Appendix H, *Local Policies Governing Land and Shoreline Use*.

[1] Chapter 4, *Environmental Health and Safety*, addresses the potential impacts from increased risk of accidents (e.g., storage tank failure, train derailments, vessel collisions) and related consequences (e.g., release of crude oil or other proposed bulk liquids).

[2] The PS&P rail line refers to the rail line between Centralia and the project site.

Table 3.8-1. Laws and Regulations for Land and Shoreline Use

Laws and Regulations	Description
Federal	
No federal laws or regulations apply to land and shoreline use.	
State	
Growth Management Act (RCW 36.70A)	Requires the counties and cities of the state to prepare and adopt comprehensive plans that keep with the Growth Management Act planning goals.
Shoreline Management Act of 1971 (RCW 90.58)	Establishes regulations for managing the use, environmental protection, and public access of the state's shorelines.
Local	
Zoning (HMC 10.03 and AMC 17.00)	Provides descriptions of the zoning criteria for the Cities of Hoquiam and Aberdeen, respectively.
Critical Areas Ordinance (HMC 11.06 and AMC 14.100)	Sets forth the definitions and process for designating and protecting critical areas within the city limits of Hoquiam and Aberdeen, respectively.
Shoreline Management Act (HMC 11.04 and AMC 16.20)	Carries out responsibilities imposed by the Shoreline Management Act of 1971.

RCW = Revised Code of Washington; HMC = Hoquiam Municipal Code; AMC = Aberdeen Municipal Code

3.8.3 How were impacts on land and shoreline use evaluated?

This section describes the sources of information and methods used to evaluate impacts.

3.8.3.1 Information Sources

Information about the land and shoreline use in the study area was obtained through reviews of public scoping comments and local planning documents and conversations with local planners. Additionally, a site visit was conducted to observe and verify land and shoreline use in the study area on August 13, 2014.

3.8.3.2 Impact Analysis

Local land use plans and development regulations were evaluated to assess potential conflicts of the proposed action. Land use impacts occur when project activities are inconsistent with existing land use, most typically characterized by inconsistency with the applicable land use policies or zoning.

3.8.4 What land and shoreline use is in the study area?

This section describes the land and shoreline use in the study area that could be affected by construction and routine operation of the proposed action. This section addresses land and shoreline use at the project site, along the PS&P rail line, and in and along the shoreline of Grays Harbor.

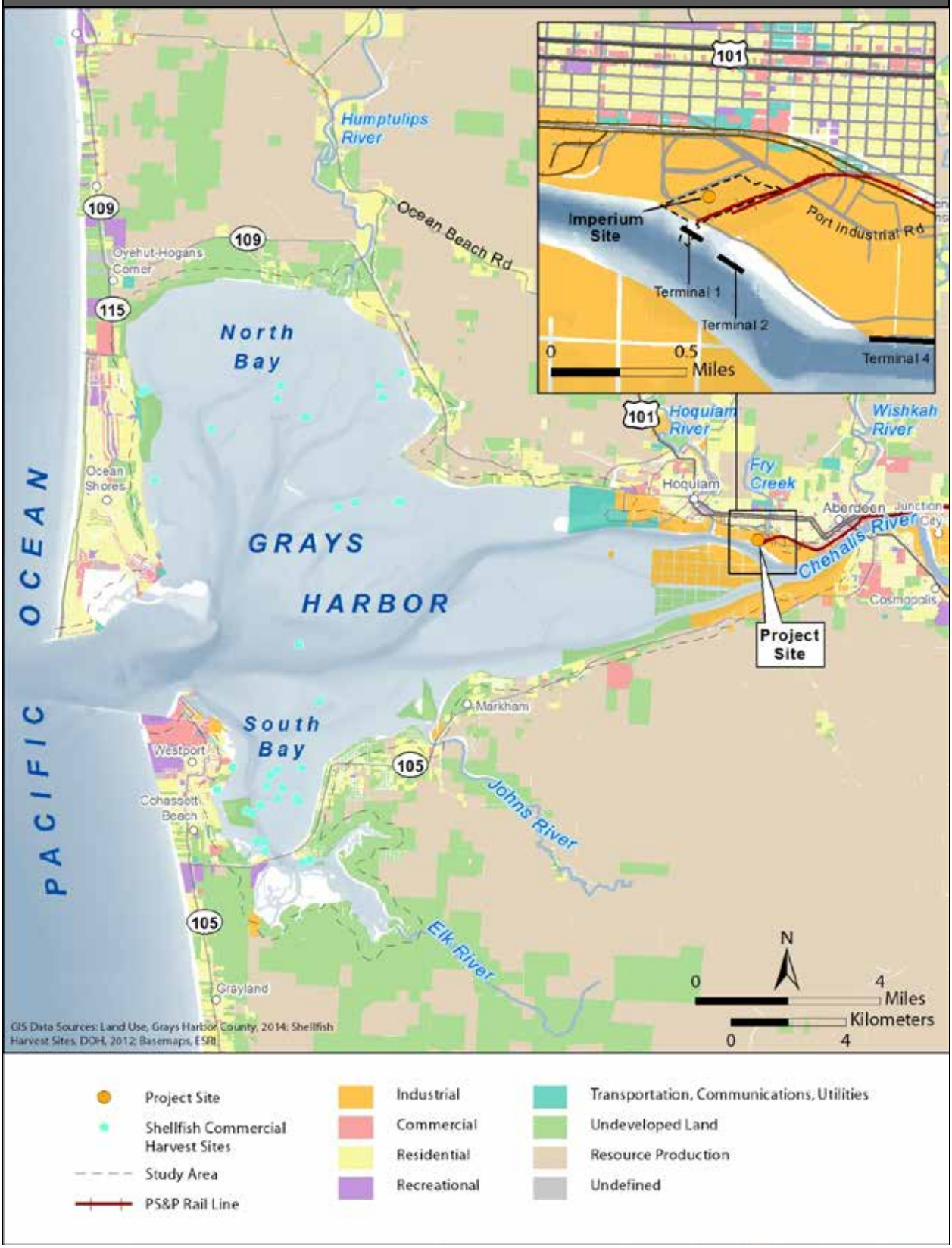
3.8.4.1 Project Site

Land Uses and Zoning

The project site is within the city limits of Hoquiam and Aberdeen in Grays Harbor County, Washington, and within the industrial waterfront at the Port of Grays Harbor (Port). According to the applicable comprehensive plans, land on and directly surrounding the site is designated and zoned for industrial uses and contain industrial activities such as the Westway Terminals LLC, a methanol storage terminal bordering the site to the southeast (Figure 3.8-1). The industrial use zone extends along the shoreline about 2 to 3 miles from the project site on both sides. Approximately 0.15 mile north of the site, beyond the industrial use area, is land designated for commercial, transportation, communications, and utility uses. Outside this area, approximately 0.25 mile north of the site, is land designated for high-density residential use mixed with some transportation, communications, utilities, and recreational uses. Recreational amenities allowing access to the harbor are also located adjacent and to the west of the project site; these and other recreational facilities are further discussed in Section 3.10, *Recreation*.

The project site is located within the Industrial District in both cities (Zoning, HMC 10.03.112; AMC 17.48). The current land use and zoning designation for the project site under both cities is Industrial, which is defined in the cities' respective comprehensive plans and municipal codes as allowing for intensive industrial uses including activities involving manufacturing, processing, ship terminals, storage and transport facilities, warehousing, repair facilities, and accessory buildings and uses. Under both Cities' shoreline master programs, the environmental designation for the project site is Urban, which permits water-related industrial and commercial uses and allows the highest density of development and the most intensive human use of the shoreline (Shoreline Management, HMC 11.04.140 and AMC 16.20.140).

Figure 3.8-1. Land and Shoreline Use in and around Grays Harbor



Applicable Permits and Approvals

The following land and shoreline use development permits and approvals are required for development of the proposed action prior to construction.

Comprehensive Plan Policies

Prior to issuing the applicable development permits, the Cities of Hoquiam and Aberdeen must ensure the proposed action is consistent with the applicable comprehensive plan policies listed in the corresponding comprehensive land use plan (City of Hoquiam 2009; City of Aberdeen 2001). Specific policies applicable to the proposed action are listed in Appendix H, *Local Policies Governing Land and Shoreline Use*. Policies relevant to the City of Hoquiam address Future Land Use; Environmental Management; Housing, Transportation; Public Facilities and Services; Open Space and Parks; and Economic Development. Elements of the City Aberdeen Comprehensive Plan address Urban and Rural Areas; Land Use; Economic Development; Housing and Community Development; Transportation; Capital Facilities; Natural Resources; Downtown and Waterfront Development; Open Space and Critical Areas; Utilities; and Plan Implementation.

Critical Areas Review

As part of the development permit application process for the Cities of Hoquiam and Aberdeen and to comply with the Growth Management Act (RCW 36.70A), the applicant would be required to submit a report to the Cities for a review of critical areas. Within Hoquiam's jurisdiction, critical areas including fish and wildlife habitat and geologically hazardous areas on or within 300 feet of the project site. Geologically hazardous areas have also been identified on or within 300 feet of the project site within Aberdeen's jurisdiction. These critical areas have been identified and evaluated in Section 3.1, *Earth*, and Section 3.5, *Animals*.

Shoreline Substantial Development Permit

To comply with the City of Hoquiam's Shoreline Master Program and the Shoreline Management Act (RCW 90.58), the applicant must apply for a shoreline substantial development permit because the proposed action would be partially constructed within 200 feet of the ordinary high water mark of Grays Harbor (HMC 11.04.040; RCW 90.58.030(d)). A shoreline substantial development permit would also be required for the City of Aberdeen because the proposed action within Aberdeen's jurisdiction would be within 200 feet of the ordinary high water mark of Grays Harbor (AMC 16.20.040; RCW 90.58.030(d)).

Conditional Use Permit

As part of Hoquiam's development permit application process, the applicant must apply for and be granted a conditional use permit because the height of the proposed storage tanks (64 feet) would exceed the City's maximum height standard (55 feet) for its Industrial District (HMC 10.03.100.3). A conditional use permit is not required for the City of Aberdeen because Aberdeen's code does not include a maximum height requirement for its Industrial District (AMC 17.48).

Development Permits

As part of the development permit application process for the Cities of Hoquiam and Aberdeen, the applicant would be required to obtain a building permit, a grade and fill permit, and a fire

department permit from both Cities. These permits are required prior to construction of the proposed action to comply with the Cities' regulations on land and shoreline management.

3.8.4.2 PS&P Rail Line

As discussed in Chapter 2, *Proposed Action and Alternatives*, and shown in Figure 2-2, the PS&P rail line originates in Centralia, Washington, approximately 70 miles southeast of the project site and terminates at the Port of Grays Harbor loop track, where it splits off into the project site. The PS&P rail line traverses three counties and joins the densely populated cities of Hoquiam and Aberdeen to the west, and Centralia to the east. The area between these cities is interspersed with smaller cities and communities (Table 3.8-2). As discussed in Section 3.3, *Water*, this corridor also largely parallels the Chehalis River (within 0.1 mile) and crosses several waterways.

Table 3.8-2. Cities and Communities along the PS&P Rail Line

Grays Harbor County	
City of Hoquiam	Brady (census-designated place)
City of Aberdeen	Satsop (census-designated place)
Junction City (census-designated place)	City of Elma
Central Park (census-designated place)	Malone-Porter (census-designated place)
Alder Grove (populated place)	City of Oakville
City of Montesano	
Thurston County	
Rochester (census-designated place)	Grand Mound (census-designated place)
Lewis County	
Fords Prairie (census-designated place)	City of Centralia

Land uses along the PS&P rail line in the densely populated areas include industrial, commercial, residential, and recreational uses, as well as areas designated for transportation, communications, and utilities. Through Hoquiam and Aberdeen, the PS&P rail line appears to split land uses with industrial uses to the south and most other uses (mainly commercial and residential) to the north of the line. In this area, the PS&P rail line runs alongside (within 0.1 mile) of the Chehalis River. Moving east outside of Aberdeen, the rail corridor runs directly adjacent to the river. In Centralia, from north to south, the PS&P rail line cuts through an Industrial District, crosses the Skookumchuck River, and traverses a variety of mid-to high-density residential and commercial uses.

Outside of the high-density areas, land along the PS&P rail line is mostly rural, consisting of agricultural land and forested undeveloped areas dotted with small cities and communities (Table 3.8-2). These communities mainly contain low-density residential uses. Some commercial businesses and industrial and recreational uses are located in the larger communities (Montesano, Elma, Oakville, Grand Mound, and Ford's Prairie). South of the PS&P rail line, between Oakville and Rochester, is the 4,438-acre Chehalis Indian Reservation. The reservation is located along the Black River where tribal members live under their own independent government. Additional information on the Chehalis Indian Reservation is provided in Section 3.12, *Tribal Resources*.

As noted previously, a large amount of land area near and along the PS&P rail line consists of undeveloped land, including protected natural areas, state forests, and state parks. South of the Central Park, the PS&P rail line travels adjacent to the Chehalis River Surge Plain, a 3,018-acre

designated natural area along the Chehalis River Valley. This area is maintained by the Washington State Department of Natural Resources and contains the largest high-quality tidal surge plain wetland in Washington. Additional information on the Chehalis River Surge Plain is available in Sections 3.3, *Water*; 3.4 *Plants*; 3.5 *Animals*; and 3.10 *Recreation*. Another notable protected area is the Capitol State Forest, a 91,650-acre working forest located along, and in some areas adjacent to, the PS&P rail line east of Elma, Malone-Porter, and Oakville. This and other open space areas and parks are described further in Section 3.10, *Recreation*.

3.8.4.3 Grays Harbor

Grays Harbor is an estuarine bay approximately 50 miles west of Olympia on the central coast of Washington. It comprises a north and south bay and includes a navigation channel operated by the U.S. Army Corps of Engineers to accommodate safe passage for large vessel traffic through the harbor. The harbor is surrounded by land to the north, east, and south, and is separated from the Pacific Ocean by two peninsulas (north and south). A majority of the surrounding land includes forested areas that have undergone extensive timber harvest in the past 150 years. This area is sparsely populated except for Aberdeen, Hoquiam, Cosmopolis, Ocean Shores, and Westport, which have populations ranging from approximately 17,000 (Aberdeen) to 1,700 (Cosmopolis).

General land uses surrounding the harbor include residential, industrial, commercial, transportation/communications/utilities, recreation, resource production (i.e., agriculture, fishing, and mining activities and designated forest land), and undeveloped land (Figure 3.8-1). Generally, development is more concentrated on the eastern and western sides of the harbor and the majority of undeveloped land is located along the northern and southern sides.

Residential areas surround Grays Harbor on all sides and are particularly concentrated in and around city and industrial areas. Residential uses are also clustered in the peninsulas in and around Westport and Ocean Shores, which are popular vacation and retirement areas.

Industrial and commercial use is prevalent on the eastern side of Grays Harbor, along the shoreline in Aberdeen, Hoquiam, and Cosmopolis, and along the western side, particularly in Westport. Businesses mainly include lumber production, manufacturing, shipbuilding, food and seafood processing, and commercial fishing (Greater Grays Harbor 2014). Some industrial land uses are located in the harbor's waters because of zoning of intertidal areas. These uses include cranberry cultivation and shellfish farming. Commercial shellfishing in the harbor (Figure 3.8-1) produces oysters and clams for local, national, and global consumption. Commercial crabbing also occurs on the western side of the harbor, between the North and South Bays. Shellfish, fisheries, and other collection areas important to tribes in the study area are discussed in detail in Section 3.12, *Tribal Resources*.

Grays Harbor encompasses many recreational areas, including several state and local parks and designated wildlife areas. Fishing, shellfishing, bird and wildlife viewing, hiking, and boating are popular recreational activities throughout the harbor. Most of Grays Harbor's recreational areas are on the western half of the harbor in and near the northern and southern peninsulas. Closer to the project site is the Grays Harbor National Wildlife Refuge, a 1,500-acre designated wildlife area internationally recognized for its significant shorebird habitat. The refuge is located along the northern shore of Grays Harbor at the western city limits of Hoquiam, approximately 3 miles northwest of the project site. Details on recreational parks and wildlife areas are provided in Section 3.10, *Recreation*.

Land designated for transportation, communication, and utility use occurs in a few areas around Grays Harbor. Most notable is the Bowerman Airport or Bowerman Field, a public-use airport owned by the Port and located along the northern edge of the harbor. This designation also includes two smaller public-use airports and marinas located along the harbor near Westport and Ocean Shores and the Ocean Shores Sewage Treatment Plant, a utility service located near the end of the northern peninsula.

3.8.5 What are the potential impacts on land and shoreline use?

This section describes impacts on land and shoreline use that could occur in the study area. Potential impacts of the no-action alternative are described first, followed by potential impacts of the proposed action.

3.8.5.1 No-Action Alternative

Under the no-action alternative, impacts on land and shoreline use related to construction of the proposed action would not occur. The applicant would continue to operate its existing facility as described in Section 2.1.2.2, *Existing Operations*. Although the proposed action would not occur, it is assumed that growth in the region would continue under the no-action alternative, which could lead to development of another industrial use at the project site within the 20-year analysis period (2017 to 2037). Such development could result in impacts similar to those described above for the proposed action.

3.8.5.2 Proposed Action

This section describes the impacts that could occur in the study area as a result of construction and routine operation of the proposed action. First, this section describes impacts from construction of the proposed action. It then describes impacts of routine operation at the project site and of routine rail and vessel transport to and from the project site.

Construction

Although construction would result in short-term disturbance (increased noise, air emissions, and localized traffic), as noted above in Section 3.8.4.1*, Project Site*, the project site and immediately surrounding land uses are zoned Industrial. Construction would occur in both Hoquiam's and Aberdeen's Industrial Districts, where construction activities are compatible with the land and shoreline use designations of both Cities' comprehensive land use plans and shoreline management programs. The applicant has been granted a conditional use permit by the City of Hoquiam because the tanks would be taller than the 55-foot height restriction listed in the Zoning Code, HMC 10.03.100.3. As discussed in detail in Section 3.9, *Aesthetics, Light, and Glare*, the proposed facilities are not expected to substantially block or alter the existing views of residences in the study area.

Furthermore, to ensure the proposed action complies with all applicable federal, state, and local planning requirements throughout construction, the applicant would obtain all appropriate permits and/or approvals prior to construction. Therefore, impacts on land and shoreline use from construction of the proposed action are not anticipated to occur.

Operations

This section describes impacts that would occur as a result of routine operations at the project site, rail transport along the PS&P rail line, and vessel transport through Grays Harbor.

Project Site

Implementation of the proposed action would require the applicant to apply for land use permits from the Cities of Hoquiam and Aberdeen, which require demonstration of consistency with the applicable policies, zoning, and conditions (Appendix H, *Local Policies Governing Land and Shoreline Use*). Therefore, operation of the proposed action at the project site would be consistent with the applicable policies, including consistency with comprehensive plans, zoning ordinances, critical areas ordinances, and shoreline master programs. The proposed action would implement an appropriate and allowable use in Hoquiam's and Aberdeen's Industrial Districts that would be consistent with the land use plans and zoning requirements of both cities. To ensure compliance with these requirements and consistency with the applicable land use and shoreline management programs and ordinances, the applicant would obtain all appropriate permits and approvals.

Rail and Vessel

Increased traffic associated with the proposed action would occur in existing transportation corridors. Rail and vessel transport in these areas is currently ongoing and is consistent with applicable land use plans, policies, zoning, and regulations.

3.8.6 What required permits and plans apply to land and shoreline use?

The following permit conditions and required plans are expected to reduce impacts on land and shoreline use.

- City of Hoquiam and City of Aberdeen Critical Areas Review for fish and wildlife habitat and geologically hazardous areas
  - Critical area review report
  - Buffer establishment and protection requirements
  - Buffer mitigation and monitoring requirements
  - Buffer activity limits and restrictions
- City of Hoquiam and City of Aberdeen Shoreline Substantial Development Permits
  - Permits the proposed action as a reasonable and appropriate use of shoreline
  - Consistency with the Shoreline Management Master Program
  - Protection of shoreline resources and functions
- City of Hoquiam Conditional Use Permit
  - Provides an exception from height restrictions for proposed storage tanks
- City of Hoquiam and City of Aberdeen Building Permits
  - Permits the proposed action as compliant with 2012 International Building Codes

  - Requirement for compliance with American Society of Civil Engineers 7-02 and American Petroleum Institute 650 design and construction standards, including climatic and geologic loading requirements
  - Erosion control plan
  - Geotechnical report
  - Shoreline substantial development permit
  - Critical areas review
- City of Hoquiam and City of Aberdeen Grade and Fill Permits
  - Permits the proposed action as compliant with city practices to prevent flood damage
- City of Hoquiam and City of Aberdeen Fire Department Permits
  - Permits the proposed action as meeting fire prevention and suppression requirements
  - Adherence to the International Fire Code, 2012 Edition

3.8.7 What mitigation measures would reduce impacts on land and shoreline use?

This section describes the applicant mitigation that would reduce impacts on land use and shoreline from construction and routine operation of the proposed action.

3.8.7.1 Applicant Mitigation

With implementation of the permit conditions described above, impacts resulting from the proposed action are considered low and would not necessitate mitigation.

3.8.8 Would the proposed action have unavoidable and significant adverse impacts on land and shoreline use?

Compliance with the applicable regulations and permits described above would reduce impacts on land and shoreline use. There would be no unavoidable and significant adverse impacts.

3.9 Aesthetics, Light, and Glare

The aesthetic value of an area is based on the visual character and quality of the natural and human-made features of the site. It is also a function of viewers' perceptions of these features, which can vary according to how sensitive the viewer is and how much they are exposed to certain views. In a developed area, light and glare can also affect the visual landscape by detracting from the aesthetic quality and by interfering with adjacent land uses. For example, increased nighttime lighting can bother adjacent residents if the lighting is bright enough.

This section describes aesthetics, light, and glare in the study area. It then describes impacts on aesthetics, light, and glare that could result under the no-action alternative or as a result of the construction and routine operation[1] of the proposed action. Finally, this section presents any measures identified to mitigate impacts of the proposed action and any remaining unavoidable and significant adverse impacts.

3.9.1 What is the study area for aesthetics, light, and glare?

The study area for aesthetics, light, and glare consists of aesthetic resources on and near the project site that could be affected by construction and routine operation of the proposed action. The study area also includes aesthetic resources, light, and glare that could be affected during routine rail transport along the Puget Sound & Pacific Railroad (PS&P)[2] and vessel transport through Grays Harbor out to 3 nautical miles from the mouth of the harbor.

3.9.2 What laws and regulations apply to aesthetics, light, and glare?

Laws and regulations for determining potential impacts on aesthetics, light, and glare are summarized in Table 3.9-1. More information about these laws and regulations is provided in Appendix B, *Laws and Regulations*, and Appendix I, *Local Policies Governing Aesthetics, Light, and Glare*.

[1] Chapter 4, *Environmental Health and Safety*, addresses the potential impacts from increased risk of accidents (e.g., storage tank failure, train derailments, vessel collisions) and related consequences (e.g., release of crude oil or other proposed bulk liquids).
[2] The PS&P rail line refers to the rail line between Centralia and the project site.

Table 3.9-1. Laws and Regulations for Aesthetics, Light, and Glare

Laws and Regulations	Description
Federal	
No federal laws or regulations apply to aesthetics, light, and glare	
State	
Scenic Highways Regulations (RCW 47.39.020)	Dictates that scenic and recreational areas be preserved and protected from inappropriate development.
Shoreline Management Act (RCW 90.58)	Establishes regulations for managing the use, environmental protection, and public access of the state's shorelines.
Local	
Density and Dimensional Requirements (HMC 10.03.100)	Specifies height maximum of 55 feet for structures in the City of Hoquiam Industrial District.
Landscaping and Screening (HMC 10.05 and AMC 17.48)	Contains various ordinances pertaining to aesthetic resources through regulations on landscaping, signs, lighting, and screening.
RCW = Revised Code of Washington; HMC = Hoquiam Municipal Code; AMC = Aberdeen Municipal Code	

3.9.3 How were impacts on aesthetics, light, and glare evaluated?

This section describes the sources of information and methods used to evaluate impacts.

3.9.3.1 Information Sources

Information on aesthetics, light, and glare in the study area was obtained from the following sources.

- Direct field observation from vantage points, including neighboring areas, the project property, and roadways (conducted August 12 and 13, 2014).
- Photographs of key views of and from the project site and of existing sources and levels of light and glare.
- Review of the lighting and features for the proposed action that may cause glare.
- Review of the proposed action and its compliance with state and local ordinances and regulations and professional standards concerning light and glare.

3.9.3.2 Impact Analysis

The methods used in this analysis involved three steps.

1. Objectively identify the aesthetic features (visual resources) of the landscape.
2. Assess the character and quality of those resources relative to overall regional visual character.
3. Determine the importance or sensitivity to people of views of visual resources in the landscape.

3.9.3.3 Visual Concepts and Terminology

The aesthetic value of an area is a measure of its *visual character* and *visual quality*, combined with the viewer response to the area (Federal Highway Administration 1988). Scenic quality is best

described as the overall impression that an individual viewer retains after driving through, walking through, or flying over an area (U.S. Bureau of Land Management 1980). Viewer response is a combination of viewer exposure and viewer sensitivity. *Viewer exposure* is a function of the number of viewers, number of views seen, distance of the viewers, and viewing duration. *Viewer sensitivity* relates to the extent of the public's concern for a particular viewshed. These terms and criteria are described below.

Visual Character

Natural and artificial landscape features contribute to the visual character of an area or view. Visual character is influenced by geologic, hydrologic, botanical, wildlife, recreational, and urban features. Urban features include those associated with development, including roads, utilities, structures, earthworks, and the results of other human activities. The perception of visual character can vary seasonally, even hourly, as weather, light, shadow, and elements that compose the viewshed change. The basic components used to describe visual character for most visual assessments are the elements of form, line, color, and texture of the landscape features (U.S. Forest Service 1995; Federal Highway Administration 1988). The appearance of the landscape is described in terms of the dominance of each of these components.

Visual Quality

Visual quality is evaluated using the well-established approach to visual analysis adopted by the Federal Highway Administration, employing the concepts of vividness, intactness, and unity (Federal Highway Administration 1988; Jones et al. 1975), which are described below.

- *Vividness* is the visual power or memorability of landscape components as they combine in striking and distinctive visual patterns.
- *Intactness* is the visual integrity of the natural and human-built landscape and its freedom from encroaching elements; this factor can be present in well-kept urban and rural landscapes, and in natural settings.
- *Unity* is the visual coherence and compositional harmony of the landscape considered as a whole; it frequently attests to the careful design of individual components in the landscape.

Visual quality is evaluated based on the relative degree of vividness, intactness, and unity, as modified by its visual sensitivity. High-quality views are highly vivid, relatively intact, and exhibit a high degree of visual unity. Low-quality views lack vividness, are not visually intact, and possess a low degree of visual unity.

Viewer Exposure and Viewer Sensitivity

The measure of the quality of a view must be tempered by the overall sensitivity of the viewer. Viewer sensitivity or concern is based on the visibility of resources in the landscape, proximity of viewers to the visual resource, elevation of viewers relative to the visual resource, frequency, and duration of views, number of viewers, and type and expectations of individuals and viewer groups.

The importance of a view is related, in part, to the position of the viewer (viewer exposure) to the resource; therefore, visibility and visual dominance of landscape elements depend on their placement within the viewshed. A viewshed is defined as all of the surface area visible from a particular location (e.g., an overlook) or sequence of locations (e.g., a roadway or trail) (Federal

Highway Administration 1988). To identify the importance of views of a resource, a viewshed must be divided into distance zones of foreground, middleground, and background. Generally, the closer a resource is to the viewer, the more dominant it is and the greater its importance to the viewer. Although distance zones in a viewshed may vary between different geographic region and types of terrain, the standard foreground zone is to 0.25 to 0.5 mile from the viewer, the middleground zone is 0.25 to 0.5 mile to 3 to 5 miles from the viewer, and the background zone extends from the middleground to infinity (Litton 1968).

Viewer sensitivity depends on the number and type of viewers and the frequency and duration of views. Viewer sensitivity is also modified by viewer activity, awareness, and visual expectations in relation to the number of viewers and viewing duration. For example, viewer sensitivity is generally higher for views seen by people who are driving for pleasure, people engaging in recreational activities such as hiking, biking or boating, and homeowners. Sensitivity tends to be lower for views seen by people driving to and from work or as part of their work (U.S. Forest Service 1995; Federal Highway Administration 1988; U.S. Soil Conservation Service 1978). Commuters and nonrecreational travelers have generally fleeting views and tend to focus on commute traffic, not on surrounding scenery; therefore, they are generally considered to have low sensitivity. Residential viewers typically have extended viewing periods and are concerned about changes in the views from their homes; therefore, they are generally considered to have high sensitivity. Viewers using recreational trails and areas, scenic highways, and scenic overlooks are usually assessed as having high sensitivity.

Judgments of visual quality and viewer response must be made based in a regional frame of reference (U.S. Soil Conservation Service 1978). The same landform or visual resource appearing in different geographic areas could have a different degree of visual quality and sensitivity in each setting. For example, a small hill may be a significant visual element on a flat landscape but have very little significance in mountainous terrain.

3.9.4 What aesthetic resources are in the study area?

This section describes aesthetics, light, and glare in the study area that could be affected by construction and routine operation of the proposed action. This section provides the general context for aesthetics, light, and glare in the study area and describes aesthetics, light, and glare at the project site, along the PS&P rail line, and in and along the shoreline of Grays Harbor.

3.9.4.1 Project Site

As discussed in Chapter 2, *Proposed Action and Alternatives*, the project site is developed and currently operates as a biodiesel production and distribution facility. Predominant visual features consist of pavement and eight aboveground, low-glare, stainless steel storage tanks that are 80 feet wide and 60 feet tall. Five rail spurs are located to the south; office buildings and trailers are located to the northeast. The area proposed for development currently consists of weedy plants and grasses, which do not provide any aesthetic benefit in this highly industrialized setting.

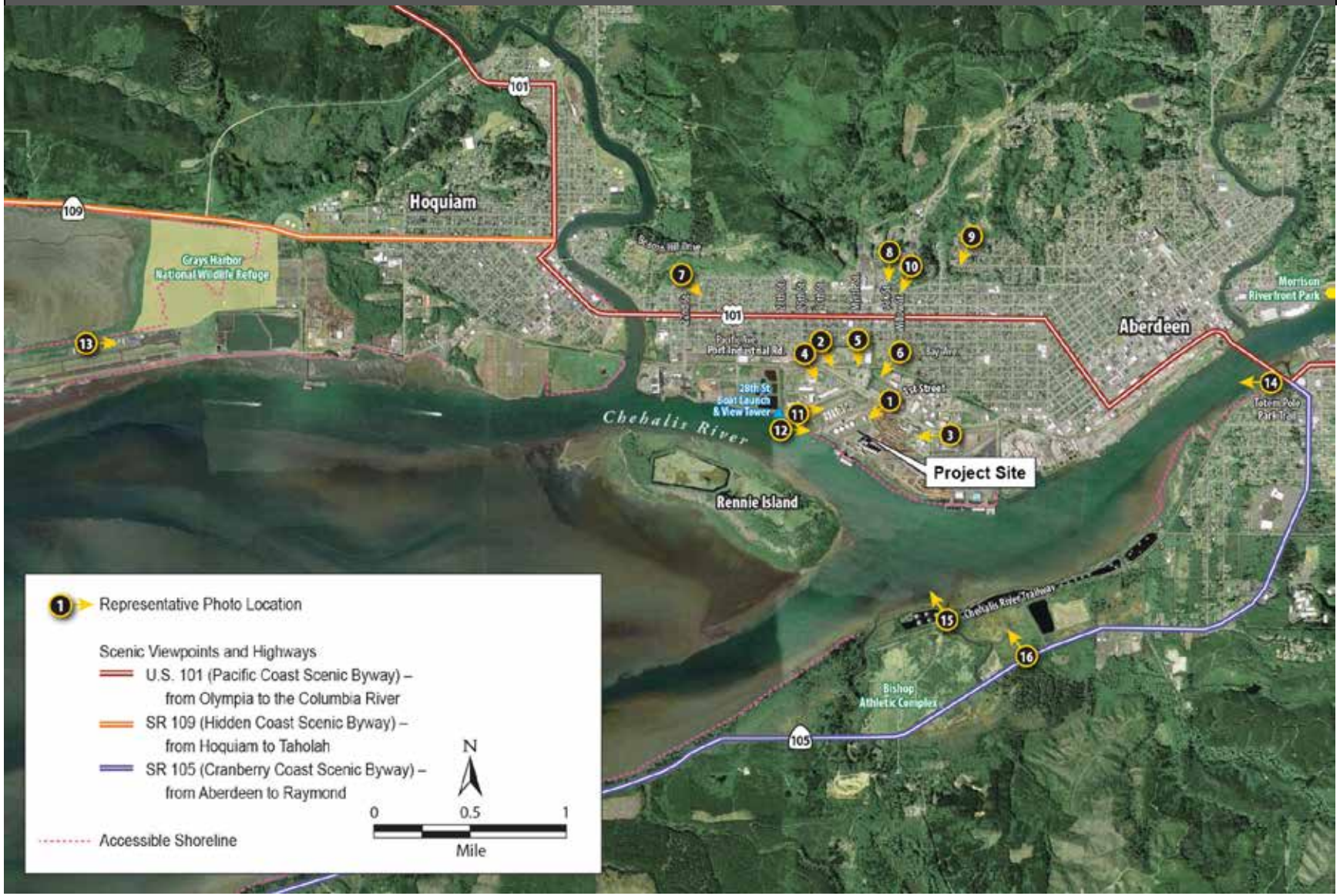
The area immediately to the north, east, and south of the project site consists of other industrial. The Hoquiam River and Rennie Island lie to the southwest. The project site is primarily visible to motorists traveling on roadways surrounding the project site (Chapter 2, *Proposed Action and Alternatives*, Figure 2-2). Individuals participating in recreational activities at the 28th Street Boat Launch and Viewing Tower and recreationalists (Section 3.10, *Recreation*, Figure 3.10-1) and

commercial and tribal fishers in the harbor (Section 3.12, *Tribal Resources*, Figure 3.12-1) can also view the site.

The nearby Ag Processing, Inc. (AGP) facility has eight concrete storage silos, approximately 75 feet wide and 135 feet tall and four clustered, concrete storage silos approximately 40 feet wide and 127 feet tall. The top of the tan-painted steel structure that is on top of the four clustered silos is 280 feet tall. The 12 silos are all composed of gray concrete. AGP also has a large offloading dock along the shoreline and timber storage yards east of the silos and up to Port Industrial Road. AGP's storage tanks and silos are the tallest at the Port of Grays Harbor (Port) and are often the tanks seen rising above the tree line.

Views of the project site include industrial operations and infrastructure. However, from some viewpoints the industrial uses are juxtaposed against the forested hillsides and waterfront. The foreground views of the surrounding area that include the project site exhibit low to moderate visual quality. Residents, recreationalists, and roadway users viewing the project site would all have low to moderate visual sensitivity to changes to the project site because all users are familiar with the industrialized visual conditions and operations associated with the Port. Specific views of the project site are discussed and shown in photographs below. Locations of the photographs are shown in Figure 3.9-1.

Figure 3.9-1. Photo Locations



- **Ground-level views.** Port Industrial Road and its intersection with 1st Street provide the most direct, least-obstructed foreground views of the project site. Foreground views consist of the timber and mulch piles and the storage tanks at the project site and at the Westway and AGP facilities. It is also possible to see the associated facilities, including rail tracks, office trailers, pipelines, and lights. Sensitive viewers consist primarily of motorists traveling along Port Industrial Road (Figure 3.9-2). Although there is a relatively high number of motorists in this area each day, viewer sensitivity is considered low because motorists are passing by and are exposed to views for only a short time.

  The taller Imperium tanks and AGP silos, industrial buildings and office trailers, and existing trees and shrubs limit views of the Westway tanks even a short distance beyond the immediate vicinity (Figures 3.9-3 and 3.9-4); however, limited foreground views are also visible to residents in this area. While partial views of the taller AGP silos and Imperium tanks are sometimes present, views of the shorter Westway tanks from these roadways are often obscured by the taller tanks and silos, industrial buildings and office trailers, residential and commercial development north of the site, wooden utility poles, and existing trees and shrubs (Figures 3.9-5 and 3.9-6). Some limited views of the tops of the tanks may be seen from nearby residences and businesses and by recreationalists in local parks; however, foreground views of the tanks are mostly obscured or not available (Figure 3.9-7).

- **Hillside views.** Views from elevated hillsides north of the project site often allow for views of the project site. Views are also available from hillside roadways and residential, commercial, and institutional uses. Residents can see the project site in the middleground from the elevated hillsides to the north. However, like ground-level views, views of the shorter Westway tanks are fully to partially obscured by intervening trees and shrubs and development, although the tops of the taller Imperium and AGP tanks are visible (Figure 3.9-8). Even when coming downhill, where views of the taller AGP silos and Imperium tanks can be identified, views of the Westway tanks are not discernable (Figure 3.9-9). Partial to full views of the Westway tanks do exist where the viewing location is high enough and trees and development do not intervene (Figures 3.9-10 and 3.9-11).

- **Recreational views**. Nearby recreational areas have limited views of the site. The closest recreational feature is the 28th Street view tower and boat ramp, which has foreground views of the project site. The Imperium tanks are most visible with views of the Westway tanks most visible from the view tower (Figure 3.9-12). Views from the boat ramp primarily focus is on the AGP silos and structures associated with the Terminal 1 berth (Figure 3.9-13).

  Views of the project site from more distant recreational areas are more limited. From the Bowerman Basin Sandpiper Trail at the Grays Harbor National Wildlife Refuge (Figure 3.9-14) and from the Totem Pole Park Trail (Figure 3.9-15), located across the harbor, it is possible to see the AGP silos in the background, but it is not possible to discern the applicant's specific facilities at the project site from the broader industrial development. The storage tanks can be seen from the Chehalis River Walkway, along the south bank of the Chehalis River approximately 1 mile southeast of the project site, but views are often screened by fencing, the aboveground pipeline, and vegetation along the trail and harbor shoreline (Figure 13.9-6).

- **Scenic byway views.** The project site can be seen by motorists traveling on State Route 105 (SR 105) (in Oregon) where gaps in vegetation are present along the roadway; however, as seen in Figure 3.9-17, it is difficult to distinguish the project site features from the surrounding industrial development. Views of the project site from vantages across the harbor are limited by

topography and vegetation. For example, the project site is not visible from residential areas of Aberdeen that are south of the harbor, the Bishop Athletic Complex, or from most vantages along SR 105. Although the nearby AGP silos may be visible, views of the project site from US Route 101 (US 101) and State Route 109 (SR 109) are not available due to intervening development, infrastructure, and vegetation.

- **Water-based views.** The project site is visible from recreational, commercial, and industrial vessels in the harbor and close to the Terminal 1 berth. Visibility is limited by elevation moving farther from the shoreline.

The visual character of the project area consists of a mix of industrial, commercial, residential, and recreational uses. Views of the harbor and vegetated hillsides serve as a scenic backdrop, helping to increase the overall vividness of the project vicinity. However, somewhat disjointed land uses and the presence of human-made structures affect the overall intactness and unity of the project vicinity, as a whole. Therefore, depending on the specific location, visual quality can range from moderately low in highly industrialized portions of the vicinity to moderately high in areas with fewer encroaching features (industrial facilities) and views of primarily homes and natural landscapes (hillsides and harbor) are more intact.

Figure 3.9-2. View From 1st Street at the Intersection with Port Industrial Road Looking Southwest toward the Project Site

Figure 3.9-3. View From Port Industrial Road, Near 29th Street, Looking Southwest toward the Project Site

Figure 3.9-4. View From the Home Depot Parking Lot Looking West toward the Project Site

Figure 3.9-5. View From the Intersection of Pacific Avenue and 30th Street Looking Southeast toward the Project Site

Figure 3.9-6. View From the Intersection of Pacific Avenue and Myrtle Street Looking South toward the Project Site

Figure 3.9-7. View From the West End Playfield on Bay Avenue Looking Southwest toward the Project Site

Figure 3.9-8. View From Beacon Hill Drive Looking Southeast toward the Project Site

Figure 3.9-9. View From Oak Street, Near Hemlock Street, Looking South toward the Project Site

Figure 3.9-10. View From Council Crest Drive Looking Southwest toward the Project Site

Figure 3.9-11. View From the Grays Harbor Community Hospital Looking Southwest toward the Project Site

Figure 3.9-12. View From the 28th Street View Tower Looking Northeast toward the Project Site

Figure 3.9-13. View From the 28th Street Boat Ramp Dock Looking East toward the Project Site

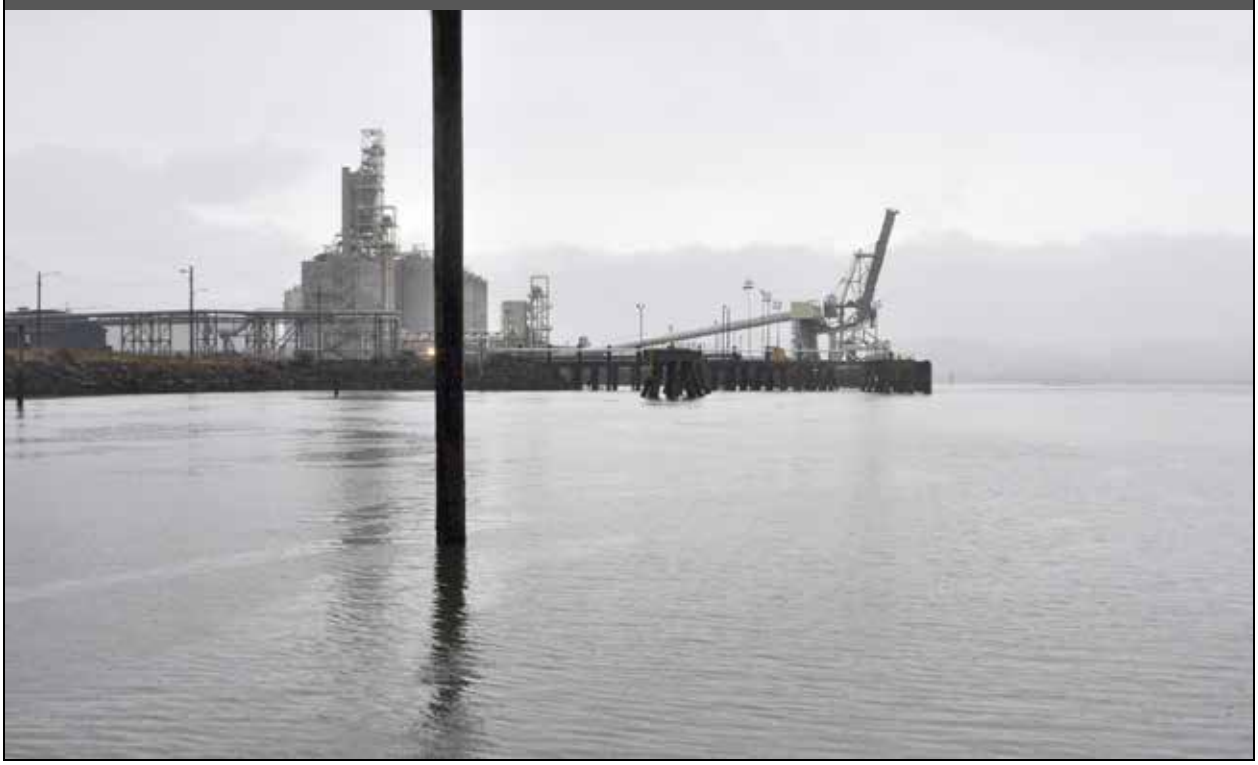


Figure 3.9-14. View From Airport Way, Near Grays Harbor National Wildlife Refuge, Looking East toward the Project Site

Figure 3.9-15. View From Totem Pole Park Trail, Near U.S. 101 Bridge Over the Chehalis River, Looking West toward the Project Site

Figure 3.9-16. View From the Chehalis River Walkway Looking Northwest toward the Project Site

Figure 3.9-17. View From SR 105 Looking Northwest toward the Project Site

Light

The project site and the Port are well lit at night. Existing sources of light include interior office lighting, exterior safety lighting on buildings, overhead lighting to illuminate outdoor work areas, lighting at the dock and rail offloading areas, weigh station lighting, and lighting at the tops of stair cases that lead to the tops of the storage tanks and silos.

Sources of light seen from the area surrounding the project site include interior and exterior lighting associated with residential, commercial, and industrial development; overhead streetlights; vehicle headlights; train headlights; lighting on vessels; and nighttime stadium lighting associated with local sports fields. The concentration of nighttime lighting from Hoquiam, Aberdeen, and Cosmopolis produces ambient light glow that radiates into the night sky.

Glare

Existing sources of glare include reflective surfaces such as the existing white storage tanks, light-colored building exteriors, building windows, vehicle windows, and lighter paved surfaces lacking vegetative cover. A major source of glare near the project site is the water surface of Grays Harbor and Chehalis River, which are large, reflective bodies of water that can reflect sunlight, moonlight, and artificial nighttime lighting.

3.9.4.2 PS&P Rail Line

The PS&P rail line travels through the region, roughly parallel to US Route (US 12), and rail traffic is common to the existing visual landscape. In general, the PS&P rail line is most visible to those

traveling along US 12 and to residents in communities most heavily populated at the western end of the rail line in Hoquiam and Aberdeen, and at the southern end of the rail line in Fords Prairie and Centralia. Smaller communities along the PS&P rail line include Cosmopolis, Junction City, Central Park, Alder Grove, Montesano, Brady, Satsop, Elma, Saginaw, Malone, Porter, Oakville, and Rochester. In some locations, rail traffic is visible from residences and businesses close to the rail line. Although this is primarily the case in the larger communities, some rural residences are located close to the PS&P rail line.

The forested terrain on either side of the numerous river valleys and harbor create an enclosed landscape. Development is concentrated close to the rivers and harbor on flatter lands and along transportation routes. However, some development extends onto the hillsides and isolated development does occur in forested areas. Flat, fertile areas along rivers also support a patchwork of agricultural uses and the forested hillsides support timber harvest.

Near the project site, US 101 is designated as the Pacific Coast Scenic Byway from Olympia to the Columbia River (Washington State Department of Transportation 2014a). SR 109 is designated as the Hidden Coast Scenic Byway from Hoquiam to Taholah (Washington State Department of Transportation 2014b). SR 105 is designated as the Cranberry Coast Scenic Byway from Aberdeen to Raymond (Washington State Department of Transportation 2014c, 2014d). US 101 passes closet to the project site, approximately 0.5 mile to the north, and is separated from the project site by development in Aberdeen.

3.9.4.3 Grays Harbor

Forested hillsides surround Grays Harbor, which has two bars that separate the harbor from the Pacific Ocean, creating a largely enclosed bay. The shoreline communities of Ocean Shores, Westport, and Cohassett Beach support year-round residential and commercial development, tourism, commercial and sport fishing, and aquaculture. Most development around the harbor is centrally located in Hoquiam, Aberdeen, and Cosmopolis. Smaller areas of development are located around the harbor's edge, such as Grays Harbor City, Gray Gables, Ocosta, and individual properties.

Views of Grays Harbor are relatively intact and are available from land- and water-based vantages. The many recreational and wildlife areas around the bay with views of the water include Grays Harbor National Wildlife Refuge, Bowerman Basin Sandpiper Trail, Ocean Shores Bay Wildlife Area, John Gable Community Park, Damon Point State Park, Harms Field, Oyhut Wildlife Recreation Area, Bottle Beach State Park, the Chehalis River Surge Plain Natural Area Preserve, the Johns River Wildlife Area, and the Chehalis River Trailway. Views are also available through gaps in the vegetation and development along local roadways, including SR 109 and SR 105, and from residences that are near the harbor. Water-based views are available from recreational, commercial, and industrial vessels.

Views in the region vary based on viewers' location in the landscape. Many views are of high visual quality due to the available views of the harbor and rivers, tidal areas, forested hillsides, and relatively low levels of development. However, other views are somewhat degraded and include mostly industrial operations and infrastructure juxtaposed against the forested hillsides and waterfront.

3.9.5 What are the potential impacts on aesthetics, light, and glare?

This section describes the impacts on aesthetics, light, and glare that could occur in the study area. Potential impacts of the no-action alternative are described first, follow by potential impacts of the proposed action.

3.9.5.1 No-Action Alternative

Under the no-action alternative, the applicant would continue to operate its existing facility as described in Section 2.1.2.2, *Existing Operations*. Although the proposed action would not occur, it is assumed that growth in the region would continue under the no-action alternative, which could lead to development of another industrial use at the project site within the 20-year analysis period. Such development could result in impacts similar to those described above for the proposed action.

3.9.5.2 Proposed Action

This section describes the impacts that could occur in the study area as a result of construction and routine operation of the proposed action. First, this section describes impacts from construction of the proposed action. It then describes impacts of routine operation at the project site and of routine rail and vessel transport to and from the project site.

Construction

Aesthetics

The presence of construction equipment (e.g., backhoes, tractors, cranes, and trucks) and the related increase in activities would create short-term visual changes at the project site. However, as described in Section 3.9.4.1, *Project Site*, the project site is an existing industrial area and cranes and industrial operations are a common part of the visual environment. Although construction activity would increase, the use of heavy machinery is consistent with the existing visual environment at and nearby the project site.

Close views (within 1.5 miles) of the project site by the public would be limited for motorists traveling along Port Industrial Road and SR 105, and even more limited for residents to the north. Much of the construction activity would not be visible from these locations. From the 28th Street viewing tower and boat ramp, from within and across the harbor, or from any other slightly elevated vantages, it may be possible to see construction of the proposed tanks. However, as noted previously, these activities are similar to existing operations and would likely be difficult to discern from existing industrial activities. Scenic views from US 101 and SR 109 would not be affected by the proposed action because of the limited views of the project site from these locations.

Because views of the project site would be either limited or similar to existing operations and because construction would be short term, construction of the proposed action would not result in substantial visual impacts, especially when seen from a distance of 1.5 miles or more.

Light and Glare

Because construction would take place during daylight hours (between 7:30 a.m. and 4:30 p.m.), it would not require the use of high-intensity nighttime lighting and would not negatively affect day or nighttime public views. Glare would not be increased at the project site during construction.

Operations

This section describes impacts that would occur as a result of routine operations at the project site, rail transport along the PS&P rail line, and vessel transport through Grays Harbor.

Project Site

Aesthetics

The new rail spurs would be similar to the existing rail spurs and would likely be visible only to Port workers. The new pipelines would be visually similar to the existing bridge structures and pipelines and would not constitute a substantial visual change. Vessels would be at the Terminal 1 dock more often under the proposed action (up to 200 days per year) compared to the no-action alternative (34 days per year) but the view would be similar to existing conditions. The new pipelines associated with vessel loading would be visually in keeping with, and would blend with, existing infrastructure on the dock and would not detract from views of the coastline from the harbor or the 28th Street viewing tower and boat ramp. Similarly, they would not be very noticeable or detract from views of the coastline from slightly elevated vantages, distant views, views across the harbor, or panoramic scenic vista views. Therefore, visual changes resulting from the new and lengthened rail unloading and vessel-loading facilities are not anticipated to result in substantial visual impacts on views of the Port or harbor that would negatively affect any viewer groups.

The most prominent features to be built at the project site would be the storage tanks. As described in Section 3.9.4.1, *Project Site*, the primary eight existing tanks are silver and are 80 feet tall and 60 feet wide. The nine proposed tanks would be 95 feet wide and 64 feet tall. While 15 feet taller than the tallest existing storage tanks, the proposed tanks would be approximately 40 to 48 feet shorter than the existing AGP silos. As noted in Section 3.8, *Land and Shoreline Use,* the proposed action would be required to obtain a conditional use permit from the City of Hoquiam because the proposed tanks would otherwise exceed the City's height restriction.

As described in Section 3.9.4.1, *Project Site*, foreground views of the project site would primarily include motorists traveling along Port Industrial Road, US 101, and SR 105, with even more limited views visible to residents to the north. Foreground views would also be visible to recreationalists at the28th Street viewing tower and boat ramp. Although residents and recreationalists in general are thought to have a higher sensitivity to changes in the visual environment, these viewer groups are expected to have relatively low to moderate sensitivity to changes related to the proposed action. This is because the proposed facilities are largely consistent with the existing industrial character of the Port and immediately surrounding area. As mentioned previously, motorists are also anticipated to have relatively low sensitivity to the proposed changes because they would be passing through the area.

Within and across the harbor, or from any other slightly elevated vantages (such as the residential area farther to the north), it may be possible to see the proposed tanks, particularly the taller tanks, in the middleground or background; however, it would likely be difficult to discern the proposed facilities from the existing industrial area. Scenic views from US 101 and SR 109 would not be

affected by the proposed action because of these locations provide limited views of the project site. Additionally, the proposed facilities are consistent with the existing industrial character of the immediately surrounding area and would not materially change the visual character or quality of the views from these locations. Implementation of the mitigation measures described in Section 3.9.7.2, *Applicant Mitigation*, would further reduce the impact of visual changes.

Light and Glare

The proposed rail unloading and vessel-loading facilities would require some additional lighting for nighttime operations. Similar to existing conditions, lighting would not be needed to illuminate the new pipelines. The dock safety unit (a component of the marine vapor combustion unit) at the dock may need some additional lighting, similar to what currently exists at the dock. The storage tanks would also have lighting at the top of the tank staircases, similar to the existing tanks. Some additional security lighting is also likely.

As described in Section 3.9.4.1, *Project Site*, the project site and the Port are well lit at night. New lighting would result in only minor increases, except at the dock where night loading would require additional lighting, compared to existing conditions. The changes in lighting toward the interior of the Port and away from residential areas are not anticipated to affect views from scenic routes. Operating hours are not limited to daylight hours; increased light at the dock for night loading is anticipated to occur up to an estimated 200 nights per year and could affect views from within and across the harbor. Although nighttime lighting would increase compared to the no-action alternative, new sources of nighttime lighting are not expected to affect any viewer groups negatively. Additionally, implementation of the mitigation described in Section 3.9.7.2, *Applicant Mitigation*, would further reduce potential impacts related to increased lighting.

While the proposed tanks would mostly blend in with the existing tanks (both at the project site and in the immediately surrounding area), silos, and offloading infrastructure and would be in keeping with the existing visual character at the Port, they could stand out slightly if they were to be painted in a highly reflective color. This could draw viewers' attention toward the tanks and resulting in increased glare on sunnier days. As described in Section 3.9.7.2, *Applicant Mitigation*, painting the tanks in a more subdued tone may help them to blend better with the majority of tanks at the Port. This would also ensure that a larger clustering of brightly colored tanks does not become a focal point associated with the Port in scenic views. The hose tower or loading arm and marine vapor control system would be colored similar to existing structures on the dock and would not increase glare in any views. This would reduce the potential for glare seen by onsite workers, within scenic views, or where the tops of tanks are visible from nearby vantages by avoiding a clustering of large, white surfaces that are more reflective than gray. Changes in glare would not affect views from scenic routes because they would not be readily visible due to distance and intervening development and vegetation. Furthermore, the proposed action would not conflict with laws and regulations related to light and glare, which are described in Section 3.9.2, *What laws and regulations apply to aesthetics, light, and glare?*.

Rail and Vessel

As stated previously, increased traffic associated with the proposed action would occur within existing transportation corridors. Rail and vessel transport in these areas is ongoing and a predominant part of the visual landscape in these areas. Currently, rail and vessel operators use lighting for safety when operating at night. In general, nighttime train lighting is directed downward and ahead of the train to illuminate the path forward or to make the train more visible to others.

Vessels are required by law to display lights for navigation and these lights would be visible in a 360-degree arc around the vessel. These lights are designed to identify the vessel and its location but do not act as floodlights to illuminate the surrounding area.

Although most lighting would not disturb surrounding land uses, the proposed action would result in the potential for increased nighttime lighting compared with the no-action alternative. Under the no-action alternative, there is currently an average of three train trips[3] per day (1,095 per year) along the PS&P rail line and one large commercial vessel trip per day (436 trips per year). The proposed action would result in approximately two unit train trips per day on average (730 per year maximum) and one tank vessel trip per day on average (400 per year maximum). While it is not possible to determine what proportion of the additional traffic would occur at night, it is possible that some small increase in nighttime traffic would occur.

3.9.6 What required permits and plans apply to aesthetics, light, and glare?

The following permit condition is expected to reduce impacts on aesthetics, light, and glare.

- City of Hoquiam Conditional Land Use Permit
  - Grants exception to maximum height of 55 feet specified in the Density and Dimensional Requirements (HMC 10.03.100)

3.9.7 What mitigation measures would reduce impacts on aesthetics, light, and glare?

This section describes the applicant mitigation that would reduce impacts on aesthetics, light, and glare from construction and routine operation of the proposed action.

3.9.7.1 Applicant Mitigation

The applicant will implement the following mitigation measures.

- To reduce potential glare, the applicant will ensure the proposed storage tanks are of a tone that blends into the surrounding landscape and/or match the existing facility tank paint or insulation, appropriate to the existing design and without affecting air emissions for the surrounding facilities.
- To ensure that lighting at the project site does not conflict with other land uses, the applicant will coordinate with the Port of Grays Harbor to develop the proposal for project lighting.

3.9.8 Would the proposed action have unavoidable and significant adverse impacts on aesthetics, light, and glare?

Compliance with the applicable regulations and permits along with implementation of the mitigation measures described above would reduce impacts on aesthetics, light, and glare. Although

[3] A trip represents one-way travel; in other words, an inbound trip and an outbound trip are counted as two trips.

the proposed action would result in unavoidable visual changes, there would be no unavoidable and significant adverse impacts.

3.10 Recreation

Recreation provides humans with the opportunities for relaxation, enjoyment, and engagement with the natural and human-made environment. In Grays Harbor, recreational uses and areas are important for local lifestyles and the economy. Recreation activities include water-based activities (boating, fishing, beachcombing, diving) and land-based activities (wildlife viewing, walking, and active sports).

This section describes recreational uses and areas in the study area, including parks and natural areas, fishing, bird watching, and whale watching. It then describes impacts on recreation that could result under the no-action alternative or as a result of the construction and routine operation[1] of the proposed action. Finally, this section presents any measures identified to mitigate impacts of the proposed action and any remaining unavoidable and significant adverse impacts.

3.10.1 What is the study area for recreation?

The study area for recreation consists of recreational uses and areas near the project site that could be affected by construction and routine operation at the project site. The study area also includes recreational uses and areas that could be affected during routine rail transport along the Puget Sound & Pacific Railroad (PS&P)[2] rail line and vessel transport through Grays Harbor out to 3 nautical miles from the mouth of the harbor.

3.10.2 What laws and regulations apply to recreation?

Laws and regulations for determining potential impacts on recreation are summarized in Table 3.10-1. More information about these laws and regulations is provided in Appendix B, *Laws and Regulations*.

[1] Chapter 4, *Environmental Health and Safety*, addresses the potential impacts from increased risk of accidents (e.g., storage tank failure, train derailments, vessel collisions) and related consequences (e.g., release of crude oil or other proposed bulk liquids).

[2] The PS&P rail line refers to the rail line between Centralia and the project site.

Table 3.10-1. Laws and Regulations for Recreation

Regulation, Statute, Guideline	Description
Federal	
No federal laws or regulations apply.	
State	
Department of Fish and Wildlife (Fisheries) (220 WAC)	Describes regulations related to fisheries; establishes fishing seasons and limits.
Department of Fish and Wildlife (Wildlife) (232 WAC)	Describes regulations related to use of wildlife areas and game reserves; establishes hunting seasons.
Local	
Shoreline Management Master Program Regulations (HMC 11.04 and AMC 16.20)	Carries out responsibilities imposed on the respective cities by the Shoreline Management Act of 1971.
WAC = Washington Administrative Code; HMC = Hoquiam Municipal Code; AMC = Aberdeen Municipal Code	

3.10.3 How were impacts on recreation evaluated?

3.10.3.1 Information Sources

Information about recreational uses and areas in the study area was obtained from the Washington Department of Fish and Wildlife (WDFW), local planning documents, scoping comments, personal communications with local planners, and a review of aerial photography. Additionally, a site visit was conducted to observe and verify recreational uses in the study area on August 13, 2014.

3.10.3.2 Impact Analysis

Impacts on recreation within 0.25 mile of the project site, along the PS&P rail line, and within and along the shoreline of Grays Harbor were qualitatively assessed based on an evaluation of how construction and routine operation of the proposed action could disturb recreational uses.

3.10.4 What recreational resources are in the study area?

This section describes recreational uses and areas in the study area that could be affected by construction and routine operation of the proposed action. This section describes recreation on the project site, along the PS&P rail line, and in and along the shoreline of Grays Harbor.

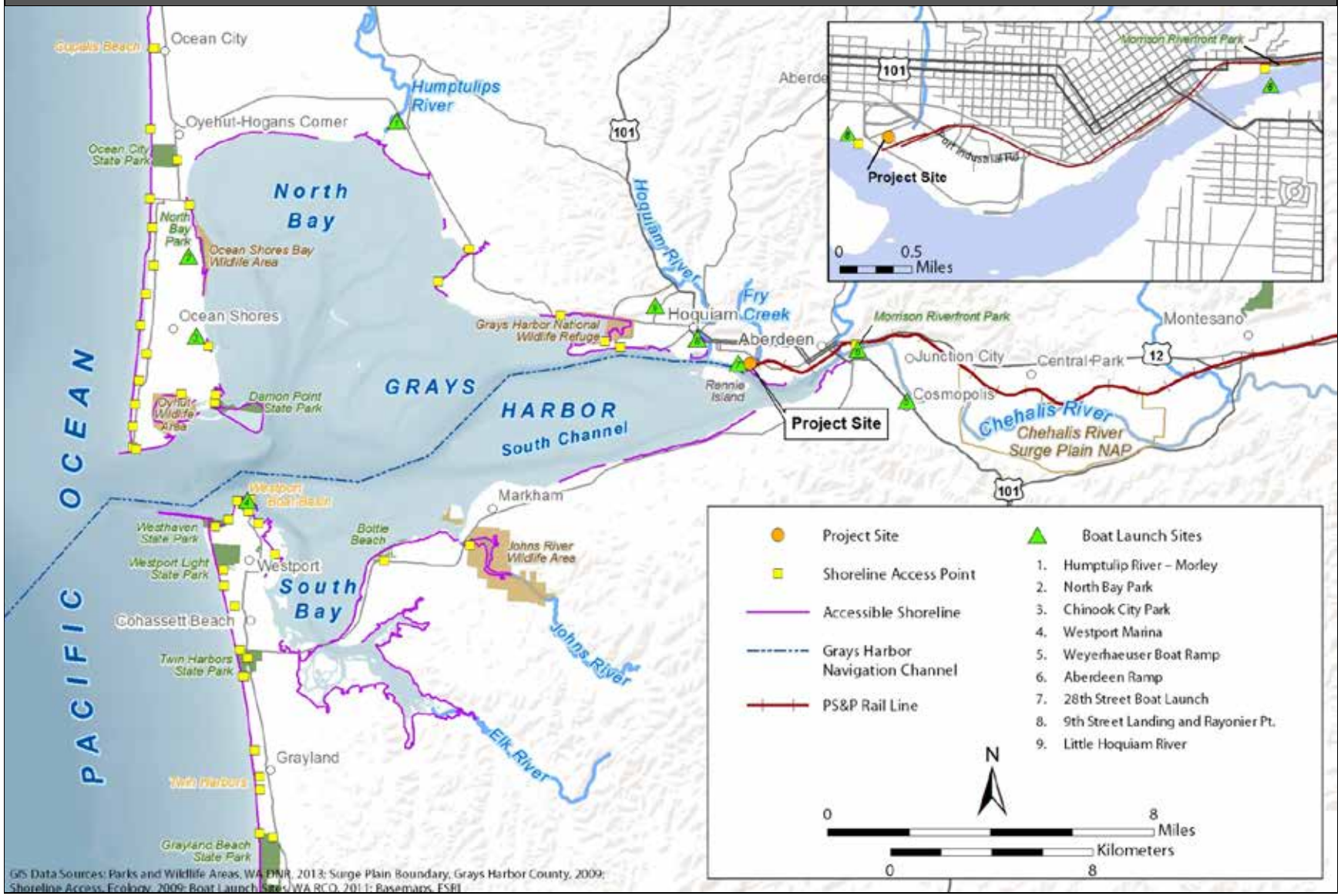
3.10.4.1 Project Site

The nearest recreational amenities to the project site are the 28th Street boat launch and observation tower, located on a 0.5-acre site adjacent to the project site (Figure 3.10-1). These facilities are owned by the Port of Grays Harbor (Port) and were developed as part of the approval process for the existing terminal development. Access to these facilities is provided by 28th Street and John Stevens Way. The boat launch includes a fishing pier and provides boaters and fishers free public access to Grays Harbor and the Chehalis River. In the fall, the boat launch is in full-use and estimated to see as many as 60 boats launched daily during the salmon run (Port of Grays Harbor 2011). Adjacent to the boat launch is an observation tower affording visitors views of the Grays Harbor, Port operations, and Rennie Island. Picnic areas are also available here. The portion of the

navigation channel adjacent to the project site and continuing east is a popular area for recreational fishing, as discussed in Section 3.10.4.3, *Grays Harbor*.

Approximately 0.25 mile northeast of the project site is a 3.5-acre neighborhood park called West End Park. This park is located within the city limits of Aberdeen and includes an open playfield with basketball courts and a softball diamond. Support facilities such as parking, bathrooms, etc. are also available (City of Aberdeen 2011).

Figure 3.10-1. Public Recreation Areas



3.10.4.2 PS&P Rail Line

Along the PS&P rail line, recreational facilities are concentrated in the more developed areas such as Hoquiam, Aberdeen, and Centralia. Facilities include community and neighborhood parks, designated waterfront recreational areas, playfields and sport facilities, and urban pathways. Along the PS&P rail line are some privately owned amenities, including golf clubs and exhibition centers. A large area along the rail corridor consists of forested open spaces that offer outdoor recreational activities. Within this area, state forests and parks, protected natural areas, and designated recreational areas provide activities such as hiking, camping, fishing, kayaking, canoeing, and wildlife viewing.

State and City Parks

Numerous state and city parks provide opportunities for outdoor recreation and day use near the PS&P rail line. The larger state and local parks are listed in Table 3.10-2 along with a general description of their facilities and recreational opportunities. Several smaller city or neighborhood parks (1 to 3 acres) are also located in the larger cities along the rail line, and these include landscaped or manicured areas, athletic fields and courts, and picnic facilities.

Table 3.10-2. State and City Parks along the PS&P Rail Line

Park	Description
West End Playfield (Aberdeen)	3.5-acre neighborhood park with playground equipment, combination ball field, parking area, and paved multipurpose park.
Morrison Riverfront Park (Aberdeen)	11-acre complex on the Chehalis River with Rotary Log Pavilion, picnic tables, fishing and viewing dock, and a 1.35-mile landscaped trail.
John W. Vessey Memorial Ball Park (Montesano)	Less than 1-acre athletic facility used for girls' softball.
Lake Sylvia State Park (Montesano)	233-acre camping park with 15,000 feet of freshwater shoreline. Facilities offer campsites, a fishing dock and boat ramp, 5 miles of hiking and biking trails, and playground equipment.
Gladys Smith Park/Lloyd Murray Park (Elma)	10-acre park with playfields for baseball, softball, and soccer. Includes picnic tables and playground facility.
Cedar Park (Centralia)	Less than 1-acre park with playground equipment, picnic tables, tennis court, basketball court, and site furnishings.

Natural Areas

Natural areas along the PS&P rail line range from approximately 100 acres to 100,000 acres, and offer opportunities for wildlife viewing, bird watching, hiking, fishing, and hunting. Table 3.10-3 provides a general description of the facilities and recreational opportunities at natural areas along the PS&P rail line.

Table 3.10-3. Natural Areas along the PS&P Rail Line

Natural Area	Description
Chehalis River Surge Plain	3,018-acre natural area maintained by WDNR, located just upstream from where the Chehalis River empties into Grays Harbor. Comprises protected high-quality tidal surge plain wetland, the largest in Washington. Includes sloughs that shelter salmon and other fish and supports birds such as osprey, bald eagles, and Olympic mudminnows. Public access is provided. Offers 3.5-mile interpretive trail for hiking, bird watching, and educational use along the southern margin. Other activities include bank fishing, kayaking, and canoeing. Hunting is limited.
Capitol State Forest	91,650-acre working forest and recreation area east of the rail corridor from Elma to Oakville. Managed by WDNR. Includes camping facilities, hiking, hunting, horseback riding, and areas for vehicle off-roading.
Black River Habitat Management Area	109-acre WDFW management area in Rochester. Provides habitat for upland birds and waterfowl and offers fishing.
Black River Preserve	320-acre preserve owned by The Nature Conservancy near Rochester offering wildlife viewing accessible by canoe or kayak only.

WDNR = Washington State Department of Natural Resources; WDFW = Washington Department of Fish and Wildlife

Recreational Fishing

As discussed in Section 3.3, *Water*, the PS&P rail line largely parallels the Chehalis River (within 0.1 mile). This waterway and its primary tributaries support recreational fishing from Grays Harbor to Centralia; however, fishing upriver from Porter is limited (Hiss and Knudsen 1993). Recreational fishing (both bank and boat fishing) typically runs from early May through January. Recreational fish species in the Chehalis River system include salmon, steelhead, trout, and some warmwater species. Several boat launches provide access the river: including the 28th Street boat launch (east Hoquiam), 9th Street Landing and Rayonier Point (Hoquiam), Pakonen Ramp (south Aberdeen), Weyerhaeuser Boat Ramp (Cosmopolis), Friends Landing Boat Ramp (Montesano), and Montesano Boat Launch (south Montesano).

3.10.4.3 Grays Harbor

The shoreline of Grays Harbor provides an abundance of opportunities for hiking, biking, picnicking, wildlife viewing, bird watching, and hunting at the numerous state and city parks and designated wildlife areas that surround the harbor. Miles of public shoreline with abundant public access provide opportunities for beachcombing and shellfishing; public boat launches provide access for recreational fishing and boating. Wave riding and surfing are other popular activities near the south jetty. The parks, wildlife areas, public shorelines, and public boat launches are shown on Figure 3.10-1 and described further in the sections below.

State and City Parks

Numerous state and city parks provide opportunities for outdoor recreation and day use near Grays Harbor. The larger state and local parks are listed in Table 3.10-4 along with a general description of their facilities and recreational opportunities. Several smaller city or neighborhood parks (1 to 3

acres) are also spread widely across the areas surrounding the harbor, and these include landscaped or manicured areas, athletic fields and courts, and picnic facilities.

Table 3.10-4. State and City Parks around Grays Harbor

Park	Description
Damon Point State Park (southeast Ocean Shores Peninsula)	61-acre day-use park at the southeastern tip of the Ocean Shores Peninsula with a walk along a 1-mile-long, 0.5-mile-wide stretch of land jutting out to the ocean. Activities include bird watching, wildlife viewing, hiking, picnicking, fishing, clamming, crabbing, rock collecting, and beachcombing.
Westhaven State Park (Westport)	79-acre day-use park near the City of Westport on the Pacific Ocean and Half Moon Bay. Activities include picnicking, fishing, clamming, horseback riding, kite flying, crabbing, surfing, scuba diving, and beachcombing.
Westport Light State Park	212-acre park on the Pacific Ocean adjacent to the historic Westport Lighthouse. Activities include hiking, fishing, beachcombing, and bird watching.
Westport City Park	7-acre park east of Westport Light State Park. Facilities include a covered picnic shelter, children's play area, tennis court, softball field, hiking trails, BMX track, and community house.
Bottle Beach State Park	75-acre day-use park in Ocosta with 6,000 feet of shoreline on Grays Harbor. Activities include bird and wildlife viewing, and a walking trail is provided.
North Bay Park	7-acre city park in Ocean Shores between the Ocean Shores Wildlife Area and Duck Lake. Facilities include a boat launch, fishing dock, athletic fields and courts, playground, and picnic shelter.
Ocean City State Park	170-acre camping park in Ocean City. Activities include camping, hiking, beachcombing, and bird watching.
Twin Harbors Beach State Park	172-acre camping park along the Pacific Coast approximately 4 miles south of Westhaven. Activities include camping, hiking, beachcombing, and wildlife viewing.

Natural Areas

Natural areas along Grays Harbor range from 185 acres to more than 3,000 acres, and offer opportunities for wildlife viewing, bird watching, hiking, fishing, and hunting. Table 3.10-5 provides a general description of the facilities and recreational opportunities offered at designated wildlife areas along Grays Harbor.

Table 3.10-5. Natural Areas around Grays Harbor

Natural Areas	Description
Oyhut Wildlife Recreation Area	682-acre wildlife area managed by WFDW at the southern end of the Ocean Shores peninsula. Features wetlands and tidal flats that shelter coastal birds, including blue herons, brown pelicans, pheasants, and federally listed (threatened) snowy plovers. Serves as a popular migrant stop for these birds and is a site for bird watching.
Ocean Shores Airport Unit	185-acre wildlife area managed by WFDW in Ocean Shores and adjacent to the harbor. Offers year-round birding opportunities and is popular for waterfowl hunting.
Grays Harbor National Wildlife Refuge	1,500-acre wildlife refuge managed by USFWS in the Grays Harbor estuary along the northeastern shore. Encompasses intertidal mudflats, salt marsh, and uplands, including the Bowerman Basin, an arm of Grays Harbor that is a world-renowned bird-watching area particularly during the spring and fall shorebird migration. Although limited, recreational activities allowed include wildlife viewing, photography, and nature study. No fishing or hunting is allowed on the refuge. Visited by over a million travelers each year (U.S. Fish and Wildlife Service 2012).
Johns River Unit, State Wildlife Area	1,500-acre area managed by WFDW in the Johns River State Wildlife Area approximately 6 miles southwest of Hoquiam. Comprises extensive mudflats and swamps that have formed behind old dikes that create prime habitat for numerous types of wildlife and waterfowl. Includes a boat launch and trails for easy public access. Hiking, wildlife viewing, fishing, and hunting are popular activities in the wildlife area.

WDFW = Washington Department of Fish and Wildlife; USFWS = U.S. Fish and Wildlife Service

Recreational Activities

Recreational activities and facilities in and along the harbor are focused on fishing, shellfishing, bird watching, and whale watching.

Fishing

Grays Harbor and several large rivers that empty into the harbor (Chehalis, Wishkah, Hoquiam, Humptulips, and Johns Rivers) provide excellent opportunities for recreational saltwater and freshwater fishing for salmon, steelhead, sturgeon, and other game fish.

Grays Harbor is a very popular small-boat fishing area, especially for large Chinook and coho salmon. Major access points include the 28th Street boat launch, Westport, Ocean Shores, and Johns River; several smaller public boat launches provide access to the water (Table 3.10-6; Figure 3.10-1). The protected nature of Grays Harbor allows small boats access to exceptional salmon fishing. Recreational fishing is open throughout the harbor but tends to concentrate in the navigation channel east of the Hoquiam River (near the project site and continuing east) and in the south channel (Figure 3.10-1), east of Johns River (Scarp pers. comm.). Most recreational salmon fishing occurs in September and early October before the commercial fishery commences (Washington Department of Fish and Wildlife 2015a). Typically, recreational fishing is limited to daylight hours. WDFW fishing regulations identify closures at night by species, location, and season.

Chartered ocean fishing for albacore tuna, Pacific halibut, rockfish, lingcod, and salmon is available from the Westport Marina, Washington's largest fish-landing port. Bank fishing is available from the

boardwalks, jetty, and piers near the Westport Marina and on the east end of the harbor near the Morrison Riverfront Park.

Grays Harbor facilities providing moorage and access for recreational fishing boats are described below. Refer to Section *3.5, Animals* for more information on the fisheries in Grays Harbor.

Westport Marina

The Westport Marina, located on a peninsula on the south side of the entrance to Grays Harbor, is home to over 200 commercial fishing vessels and many recreational boats in Grays Harbor. It has designated moorage slips for guest boats and a public boat launch ramp. Westport Marina has 21 floats with 650 boat slips. It is Washington's largest fish landing port, providing loading and fuel docks and on-shore processing and service facilities (WorleyParsons 2014).

Public Boat Launches

Public boat launches providing public access for recreational boating and fishing at Grays Harbor are listed in Table 3.10-6 along with a description of each facility's amenities and capacity for car and trailer parking. Smaller facilities typically have a single concrete or gravel boat ramp with parking capacity for up to 10 cars and between 5 and 25 trailers. Larger facilities have more than one boat ramp and substantially greater capacity for parking cars and trailers. For example, the Weyerhaeuser boat launch has two boat ramps and parking for 50 cars and 50 trailers, while the Westport Marina has three boat ramps and parking for 100 cars and 135 trailers.

Recreational boating activity fluctuates significantly depending on season, day of the week, and weather conditions. Peak boat activity in Grays Harbor is usually concentrated on weekend days during open salmon fishing season, typically from June to October, and particularly when the weather is warm and sunny. Much of the in-harbor sports-fishing activity is further concentrated in the second half of September and the first half of October. However, even in high season, the density of recreational boats and fishing vessels in Grays Harbor is considered to be low (WorleyParsons 2014).

Table 3.10-6. Public Boat Launches

Boat Launch	Description of Amenities
Humptulip River – Morley Site Manager: WDFW	1 concrete plank ramp 5 gravel car parking spaces 7 gravel trailer parking spaces
North Bay Park Site Manager: City of Ocean Shores	1 loading float 1 concrete plank ramp 7 paved car parking spaces 10 paved trailer parking spaces
Chinook City Park Site Manager: City of Ocean Shores	1 loading float 1 concrete plank ramp 10 gravel car parking spaces 5 gravel trailer parking spaces
Ocean Shores Marina Site Manager: Quinault Indian Nation	1 concrete ramp 20 paved car parking spaces 50 paved trailer parking spaces Boat moorage is available at the marina

Boat Launch	Description of Amenities
Little Hoquiam River Site Manager: Hoquiam Parks & Recreation Department	1 concrete plank ramp 10 gravel car parking spaces 25 gravel trailer parking spaces
9th Street Landing and Rayonier Point Site Manager: Hoquiam Parks & Recreation Department	1 gravel ramp 7 gravel car parking spaces No trailer parking
28th Street Boat Launch Site Manager: Port of Grays Harbor	1 loading float 1 concrete plank ramp 10 gravel car parking spaces 8 gravel trailer parking spaces
Aberdeen Ramp Site Manager: City of Aberdeen	1 concrete plank ramp 5 gravel car parking spaces 5 gravel trailer parking spaces
Weyerhaeuser Boat Ramp Site Manager: Weyerhaeuser Company	1 asphalt ramp 1 gravel ramp 50 gravel car parking spaces 50 gravel trailer parking spaces
Westport Marina Site Manager: Port of Grays Harbor	3 asphalt ramps 2 loading floats 100 paved car parking spaces 135 gravel trailer parking spaces Boat moorage is available at the marina

Source: Grays Harbor Chamber of Commerce 2000
WDFW = Washington Department of Fish and Wildlife

Shellfishing

Razor clams are found primarily on the intertidal coastal beaches (those that are exposed at low tide) from a +3 foot tide level to a -2 foot tide level. The Washington Department of Fish and Wildlife manages two razor clam harvest areas near Grays Harbor.

- **Copalis Beach**. Harvests are managed from the north jetty at the mouth of Grays Harbor to the Copalis River.
- **Twin Harbors**. Harvests are managed from the Willapa Bay north to the south jetty at the mouth of Grays Harbor.

Razor clam seasons are variable and occur only after clam samples have been tested by Washington Department of Health and are found to be safe for human consumption (Washington Department of Fish and Wildlife 2015b).

Crabbers in the harbor use crab pots to catch Dungeness and red rock crabs; however, crabs are also caught using ring nets and dip nets and by wading in shallow water during spring and early summer. The season for crabbing by use of crab pots is limited (December 1 through September 15), whereas fishing with other crab gear is open all year. Public access for crabbing is available at the Westport Boat Basin. Crabbing is allowed off any of the floats in this area as well as off the walkway along the top of the breakwater (Washington Department of Fish and Wildlife 2015c).

Bird Watching

Bird watching is a very popular recreational activity at the harbor, particularly in springtime with the peak bird migration typically in late April and early May. The Grays Harbor estuary offers many opportunities for excellent bird watching, notably at the Grays Harbor National Wildlife Refuge during the Grays Harbor Shorebird Festival. This event (hosted by the Grays Harbor Audubon Society, Grays Harbor National Wildlife Refuge, the City of Hoquiam, and local sponsors) is scheduled during the annual migration of hundreds of thousands of Arctic-bound shorebirds as they rest and feed at the estuary (Shorebird Festival 2015). Thousands of visitors attend the festival's activities, which include shorebird viewing, field trips, lectures, and a birding market place and nature fair.

Whale Watching

Whale watching off the coast of Washington peaks between March and May as gray whales migrate between feeding grounds in the North Pacific and breeding lagoons in Baja California. During the early spring, Pacific gray whales can be spotted approximately 2 miles beyond the entrance to Grays Harbor, from the north jetty, or from one of the many chartered whale-watching boats departing from Westport.

3.10.5 What are the potential impacts on recreation?

This section describes impacts on recreational uses and areas that could occur in the study area. Potential impacts of the no-action alternative are described first, followed by potential impacts of the proposed action.

3.10.5.1 No-Action Alternative

Under the no-action alternative, impacts on recreation related to construction of the proposed action would not occur. The applicant would continue to operate its existing facility as described in Chapter 2, Section 2.1.2.2, *Existing Operations*. Although the proposed action would not occur, it is assumed that growth in the region under the no-action alternative would continue, which could lead to development of another industrial use at the project site within the 20-year analysis period (2017 to 2037). Such development could result in impacts similar to those described for the proposed action.

3.10.5.2 Proposed Action

This section describes the impacts that could occur in the study area as a result of construction and routine operation of the proposed action. First, this section describes impacts from construction of the proposed action. It then describes impacts of routine operation at the project site and of routine rail and vessel transport to and from the project site.

Construction

Construction activities could have impacts on recreation if they were to limit access to recreational facilities or conflict with recreational uses (e.g., increased noise levels or visual changes that affect the recreational experience). Construction-related impacts could occur as a result of construction vehicles entering and leaving the project site and generating noise or obstructing views.

Construction vehicles would access the site from Port Industrial Road and are not likely to block or reduce vehicle access to the 28th Street boat launch, fishing pier, viewing tower, or nearby parks. No in-water construction or access to the project site by water is proposed; therefore, the activities would not conflict with in-water recreation near the project site.

As discussed in Section 3.7, *Noise and Vibration*, construction activities, primarily pile driving, would result in increased noise levels that could disturb surrounding recreational uses. Although noise would increase above ambient conditions, construction noise would be short term (up to approximately 22 months) and would not represent permanent changes to the environment.

Operations

This section describes impacts that would occur as a result of routine operations at the project site, rail transport along the PS&P rail line, and vessel transport through Grays Harbor.

Onsite

The proposed action could affect recreation if onsite operations block access to recreational facilities or conflict with adjacent recreational uses (e.g., increased noise levels or visual changes that affect the recreational experience). Because onsite operations would occur entirely within the boundaries of the project site, these activities would not block access to offsite recreational facilities. Tank vessels at berth during vessel loading would restrict recreational boating and fishing access to the area adjacent to the Terminal 1 dock. A vessel would occupy this area for up to 200[3] days per year[4] compared to 58 days per year under the no-action alternative. Impacts on recreational boaters would be low because boaters could access other boating and fishing areas throughout the harbor, including popular areas in the south channel east of Johns River and the navigation channel east of the project site.

As noted in Section 3.7, *Noise and Vibration*, operational noise levels would be similar to existing noise levels at the project site and would be consistent with current uses surrounding the project site. Although new facilities (e.g., new storage tanks, hose tower or loading arm, and new marine vapor control system) would be visible from the 28th Street viewing tower and boat launch, as discussed in Section 3.9, *Aesthetics*, *Light, and Glare*, these facilities would visually blend in with the existing infrastructure. These new features, once implemented, would not be very noticeable to viewers from nearby recreational uses.

Rail

As described in Section 3.15, *Rail Traffic*, operation of the proposed action at maximum throughput would add approximately two unit train trips[5] per day on average (730 per year maximum) along the PS&P rail line to the average of three train trips per day (1,235 per year) under the no-action alternative. This increased traffic could affect recreational uses along the PS&P rail line because of increased noise and limitations to access, which are discussed in Section 3.7, *Noise and Vibration*, and Section 3.16*, Vehicle Traffic and Safety,* respectively.

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[3] Proposed vessel trips are total for the facility so are not in addition to trips attributable to the applicant under the no-action alternative (approximately 14 per year).

[4] Assumes all vessels are tank barges with maximum 24-hour berth occupancy.

[5] A trip represents one-way travel; in other words, an inbound trip and an outbound trip are counted as two trips.

As noted in Section 3.7, *Noise and Vibration*, the passing of a train (including sounding horns for safety at PS&P rail line grade crossings) would generally result in increases in average noise levels along the PS&P rail line; however, the maximum level of noise associated with a single passby likely to be experienced by recreational areas would not change. This is because all trains would continue to travel at the same speeds and would continue to sound horns consistent with existing operational practices. An noted above, the number of events per day would increase by approximately two trips per day on average. This increased train noise could cause temporary disturbance to surrounding recreational uses, during the passage of a train. Given that the recreational uses present along the PS&P rail line already experience noise levels associated with rail operations and the temporary nature of the noise, noise impacts from the additional rail traffic under the proposed action are considered low.

Increased rail traffic along the PS&P rail line could also affect recreation if the trains block access to a recreational area for an extended period. This would occur in situations where the only public access is from roadways that cross the PS&P rail line. With the exception of the Morrison Riverfront Park, all the other recreational areas listed in Section 3.10.4.2, *PS&P Rail Line*, can be accessed by multiple roadways. Additionally, as discussed in Section 3.16, *Vehicle Traffic and Safety*, for the majority of the rail line, the increase in blockages would not result in a substantial decline in the level of service. Although the potential for an individual to encounter a train at any PS&P rail line grade crossing would increase to five times per day on average, compared to three times per day under the no-action alternative, the likelihood and duration of an individual experiencing a delay would be similar to the no-action alternative.

Morrison Riverfront Park, which can only be accessed through entrances to the Olympic Gateway Plaza, would be blocked more frequently. As described in Section 3.15, *Rail Traffic*, operation of the proposed action at maximum throughput would block all access points to the Olympic Gateway Plaza area more frequently, an average of seven more times per week compared with four times per week under the no-action alternative. Per event, the length of additional time that all access to the plaza would be blocked would increase from approximately 35 minutes to 45 minutes under the proposed action. The potential impacts on vehicle delay and mitigation measures to address delay are discussed in Section 4.16, *Vehicle Traffic and Safety*. An analysis of impacts from increased risk of accidents (e.g., vessel collisions) and related consequences (e.g., oil spills) is provided in Chapter 4, *Environmental Health and Safety.*

Vessel

As described in Section 3.17, *Vessel Traffic*, operation of the proposed action at maximum throughput would result in an average of approximately one tank vessel trip[6] per day (a maximum of 400 per year[7]) along the navigation channel compared to the 436 large commercial vessel[8] trips under the no-action alternative. This increased traffic could affect recreational activities in the harbor, including boating and fishing, by restricting access to certain areas in the harbor. Because vessel traffic under the proposed action would be limited to the navigation channel, impacts on recreational uses in the harbor but outside the channel are not expected. As noted in Section

[6] A trip represents one-way travel.

[7] Proposed vessel trips are total for the facility so are not in addition to trips attributable to the applicant under the no-action alternative (approximately 14 per year).

[8] The term *large commercial vessel* refers collectively to tank and cargo vessels.

3.10.4.3, *Grays Harbor*, and shown in Figure 3.10-1, with the exception of the 28th Street boat launch, all other major access points for recreational boaters would be distant and not affected by vessel traffic under the proposed action. Because recreational boats are smaller and are not limited to using the navigation channel, it is expected that recreational boaters would have sufficient room to navigate safely away from the launch into the harbor and would not be substantially affected by vessels passing through the navigation channel.

As noted in Section 3.10.4.3, *Grays Harbor*, recreational fishing does occur within the navigation channel, primarily in the fall (September and early October). As explained in Section 3.17, *Vessel Traffic*, this area would not be accessible while a vessel was making the trip to and from the project site. Although vessels would occupy the berth more frequently (as addressed for onsite impacts), the potential impacts related to vessel transport would be limited to the time required for a vessel to move through the navigation channel (approximately 2 hours one-way). Recreational fishing and boating is highly seasonal, and even at the height of the season, the boat density is considered low by both the pilots and the U.S. Coast Guard (WorleyParsons 2014), meaning potential conflicts are not anticipated to be frequent or to last for a substantial amount of time. Additionally, as noted in Section 3.17, alternative fishing areas include the south channel, east of Johns River, which would not be affected by vessel traffic under the proposed action. For these reasons, impacts on recreation associated with vessel transport would be low.

An analysis of impacts from increased risk of accidents (e.g., vessel collisions) and related consequences (e.g., oil spills) is provided in Chapter 4, *Environmental Health and Safety.*

3.10.6 What required permits and plans apply to recreation?

No required permits or plans apply to recreation.

3.10.7 What mitigation measures would reduce impacts on recreation?

This section describes the applicant mitigation that would reduce impacts on recreation from construction and routine operation of the proposed action.

3.10.7.1 Applicant Mitigation

The applicant will implement the following mitigation measures.

- To mitigate vehicle traffic impacts associated with rail operations related to the proposed action, the applicant will work with the City of Hoquiam, the City of Aberdeen, the Port of Grays Harbor, the Grays Harbor Council of Governments, and PS&P to address vehicle delays and/or inform motorists of potential blockages at PS&P rail line grade crossings into and out of the Olympic Gateway Plaza. The Washington State Department of Transportation, City of Hoquiam, City of Aberdeen, and Port of Grays Harbor will approve proposed measures for the areas where they are responsible for vehicle delay. The applicant will ensure acceptable measures are in place prior to beginning project operations. The proposed changes will include an evaluation of impacts on potentially affected low-income and minority populations.
- While fishing boats are required to follow the U.S. Coast Guard navigation rules, to improve awareness of vessel traffic in the navigation channel, the applicant will work with the Grays Harbor Safety Committee, including the U.S. Coast Guard and Port of Grays Harbor, to establish

procedures to announce project related vessel traffic arrivals and departures over a designated VHF marine radio channel.

3.10.8 Would the proposed action have unavoidable and significant adverse impacts on recreation?

Increased activity at the project site and rail and vessel traffic could interfere with or disrupt recreational activities but the level of impact would generally be low. Implementation of the mitigation measures listed above would further reduce these impacts.

3.11 Historic and Cultural Preservation

Historic and cultural preservation refers to the idea that a place's value is in part derived from its heritage and that this heritage is worth preserving. In this section, the term *cultural resources* is used to refer to the broad range of resources that represent or convey this heritage, or help tell the story of a region's past. A cultural resource can be considered any building, structure, object, site, landscape, or district associated with human manipulation of the environment. These resources are often valued by a particular group of people (monetarily, aesthetically, or religiously), and can be historic in character or date to the prehistoric past (i.e., prior to written records).

Three categories of cultural resources are discussed in this section: archaeological resources, historic resources, and culturally significant properties. Archaeological resources encompass features and deposits located on or below the ground surface that are evidence of prior human occupation or use in a particular area. Historic resources include elements of the built environment, such as buildings or structures, or human-made objects or landscapes. Finally, culturally significant properties are sites or locations considered culturally important to the history of a group or people, or where culturally important events or practices are known to have occurred.

In contrast, *tribal resources* refers to the collective rights and resources associated with a tribe's sovereignty or formal treaty rights, or their interest in and use of resources within a particular sphere of influence. Such resources may include cultural resources but may equally encompass elements of the natural environment, such as fisheries or the use and availability of plants and wildlife. Because tribal resources span many of the resource areas addressed in this environmental impact statement, the analysis of potential impacts on tribal resources is addressed separately, in Section 3.12, *Tribal Resources*.

This section describes cultural resources in the study area. It then describes impacts on these resources that could result under the no-action alternative or as a result of the construction and routine operation[1] of the proposed action. Finally, this section presents any measures identified to mitigate impacts of the proposed action and any remaining unavoidable and significant adverse impacts.

3.11.1 What is the study area?

The study area for cultural resources consists of the cultural resources on and near the project site that could be affected by construction and routine operation at the project site. The study area also includes cultural resources that could be affected during routine rail transport along the Puget Sound & Pacific Railroad (PS&P)[2] rail line and vessel transport through Grays Harbor.

[1] Chapter 4, *Environmental Health and Safety*, addresses the potential impacts from increased risk of accidents (e.g., storage tank failure, train derailments, vessel collisions) and related consequences (e.g., release of crude oil or other proposed bulk liquids).
[2] The PS&P rail line refers to the rail line between Centralia and the project site.

3.11.2 What laws and regulations apply to cultural resources?

Laws and regulations for determining potential impacts on cultural resources are summarized in Table 3.11-1. More information about these laws and regulations is provided in Appendix B, *Laws and Regulations*.

Table 3.11-1. Laws and Regulations for Cultural Resources

Laws and Regulations	Description
Federal	
National Historic Preservation (16 U.S.C. 470a)	The NRHP is the official list of the nation's historic places worthy of preservation and is administered by the National Park Service as part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect America's historical and archeological resources.
State	
Indian Graves and Records (RCW 27.44)	Protects Native American graves and burial grounds, encourages voluntary reporting of said sites when they are discovered, and mandates a penalty for disturbance or desecration of such sites.
Archaeological Sites and Resources (RCW 27.53)	Governs the protection and preservation of archaeological sites and resources and establishes DAHP as the administering agency for these regulations.
Abandoned and Historic Cemeteries and Historic Graves (RCW 68.60)	Protects and preserves abandoned and historic cemeteries and historic graves.
Local	
Municipal Historic Preservation Ordinances (HMC 10.06 and AMC 17.50)	Safeguards the heritage of Aberdeen and Hoquiam by the identification, evaluation, designation, and protection of historic properties. Maintains a local register of historic places in each community.

U.S.C. = United States Code; NRHP = National Register of Historic Places; RCW = Revised Code of Washington; DAHP = Washington State Department of Archaeology & Historic Preservation; HMC = Hoquiam Municipal Code; AMC = Aberdeen Municipal Code

3.11.3 How were impacts on cultural resources evaluated?

This section describes the sources of information and methods used to evaluate impacts.

3.11.3.1 Information Sources

A literature review and records search was conducted to establish the historic context for the study area using the following sources of information.

- Washington State Department of Archaeology & Historic Preservation's (DAHP) Washington Information System for Architectural and Archaeological Records Database (WISAARD) for previously completed cultural resources studies and previously documented archaeological, ethnographic, and historic resources within a 1-mile radius of the project site.
- Additional primary and secondary resources from local repositories.

- Cultural resources studies recently performed for the proposed action, supplemented by additional historical and geological documentary research. No subsurface investigations within or near the project site were conducted by these studies.
- Geological and historical documents that characterize the local geology and landform development history.
- Property-specific archival information about the project site and immediate vicinity.
- A reconnaissance-level survey of all buildings and structures determined to be 45 years of age or older at or within 300 feet of the project site.
- Excavation of three subsurface geoarchaeological borings and nine mechanical trenches. The locations and methods of these units were determined based on the consideration of previous cultural resource studies performed in the study area, a review of supplemental historical and geological research documents, and consultation with DAHP. The subsurface investigations were performed in accordance with the cultural resources workplan, which was developed based on comments and feedback from DAHP.
- Review of the sedimentary and stratigraphic data obtained during the subsurface archaeological investigations.

3.11.3.2 Impact Analysis

Data used in the identification and evaluation of cultural resources in the study area were collected from the sources described above. Appendix J, *Cultural Resources Technical Report*, describes these efforts and their results in detail.

For historic resources, identified buildings and structures 45 years of age or older on or adjacent to the project site were evaluated to determine their eligibility for listing in the National Register of Historic Places and the Washington Heritage Register. For archaeological resources, subsurface investigations at and near the project site included mechanical trenching and geoarchaeological borings. The mechanical trenches were excavated in unpaved areas to a maximum vertical reach of 24 feet, where possible. Geoarchaeological borings were used in paved areas and to supplement the mechanical trenching. They were excavated to a minimum depth of 40 feet below the ground surface in all instances. Sediment samples from the geoarchaeological borings were screened through 0.25-inch hardware cloth to identify any artifacts.

An assessment of collected information identified the potential for impacts on cultural resources in or near the project site. A review of field notes combined with previous geotechnical and geoarchaeological findings, for example, were conducted to identify the stratigraphy and age of sediments within the project site and its vicinity. In addition, 68 radiocarbon samples from four studies, including one sample collected during the current archaeological investigations, were compiled to establish past changes of sea level in the Grays Harbor Basin. These efforts helped determine the chronology of the landform creation in the project site and its potential to contain archaeological resources.

Impacts on cultural resources along the PS&P rail line and within Grays Harbor were assessed qualitatively based on an expectation of the types of resources likely to be present and an assessment of how they could be affected by routine operations. WISAARD was used to review previously recorded cultural resources in these areas and, along with the aforementioned information sources, used to establish possible resource types in the vicinity that could be affected.

Impacts were determined by evaluating if construction and operations would alter any characteristic of a cultural resource (archaeological, historical, or culturally significant) that qualifies the resource for inclusion in the National Register of Historic Places or Washington Historic Register, or affect a recorded archaeological site.

3.11.4 What cultural resources are in the study area?

This section describes cultural resources in the study area that could be affected by construction and routine operation of the proposed action. This section provides the general context for cultural resources in the study area and describes archaeological resources, culturally significant properties, and historic resources at the project site, along the PS&P rail line, and in and along the shoreline of Grays Harbor.

3.11.4.1 General Cultural Setting

This section provides the context for cultural resources in the study area.

Precontact Context

Studies of the archaeology and prehistory of the Pacific Northwest divide the prehistory of the region into multiple phases or periods from about 12,500 to 225 years before present, and are delineated by changes in regional patterns of land use, subsistence, and tool types over time. These phases are academic constructs and do not necessarily reflect Native American viewpoints.

Although the earliest evidence of human occupation in the Pacific Northwest dates to nearly 12,500 years ago (Carlson 1990; Matson and Coupland 1995), the precontact[3] archaeological record for the Washington coast almost exclusively consists of sites with contents that are consistent with assemblages from, or have been dated to, the Middle (3800 to 1500 before present) and Late Pacific (1800 to 1500 to about 225 before present) periods. Older, unidentified sites likely exist locally as well, because they are found elsewhere on the Pacific Northwest coast and especially on the eastern Olympic Peninsula (Wessen 1984, 1990). Few excavated archaeological sites exist in the Grays Harbor region, and nearly all of those date to within the past 1,000 years.

Ethnographic Context

The vicinity of the project site was traditionally inhabited by the Hoquiam and Wishkah people. The waters near the project site—including the mouth of the Hoquiam River—were also seasonally used for fishing by the Quinault people (Gibbs 1877; Curtis 1913; Hajda 1990). Grays Harbor was an important hub for habitation, resource collection, and travel for coastal Native American groups. It served as a passage for coastal tribes to the Puget Sound by way of the Chehalis River and to the Columbia River by way of the Chehalis River and the Cowlitz River. As a productive fishing area, Grays Harbor was used by numerous Lower Chehalis–speaking groups, as well as the Quinault (Miller 2009).

The precontact peoples of Grays Harbor area relied on fish for a large portion of their diet (Welsh 1942:10; Van Syckle 1982:74). Salmon fishing occurred throughout Grays Harbor and its associated rivers and creeks and particularly at the mouth of the Hoquiam River. Precontact peoples also

[3] Precontact refers to the period before European explorers and settlers established contact with the indigenous Native American people who inhabited the region.

caught eulachon, flounder, herring, lamprey, smelt, sole, and sturgeon (Miller 2009). The Grays Harbor shoreline provided habitat for terrestrial mammals, avians, and plant resources. Game included bear, beaver, deer, elk, and otter. Edible plants, such as berries, roots, and bulbs, were collected along the rivers and tide prairie. Sweetgrass (a particularly important traditionally used plant), cattail, swampgrass, and stinging nettle were collected for weaving and textiles. Nettle was also used to make nets and line for fishing (Miller 2009).

Historic Context

The Washington Territory was established in 1853, and Chehalis County (whose name was changed to Grays Harbor County in 1915) was formed the following year. The area's earliest settlers were typically cattle and dairy farmers who cleared the land. Several communities emerged to support this early settlement. Cosmopolis, a lumber-company town, was founded in the early 1850s on the Chehalis River's south shore, approximately 3.5 miles east of present-day Aberdeen, followed by the towns of Hoquiam and Aberdeen in the late 1850s.

By the mid-1860s, the land along the lower Hoquiam River was largely settled. However, Hoquiam and other Grays Harbor communities remained largely isolated, with only a few farms and established transportation routes until the 1880s. Shipping routes between Grays Harbor communities and other cities nationwide soon enabled the development of the region's logging and timber industries (Van Syckle 1982). During this period, Hoquiam and Aberdeen transformed from small agricultural communities into modern industrial cities. By 1881, local lumber mills began to export lumber to distant markets. By 1890, the local lumber industry had evolved into a large-scale commercial business and one of the most important lumber-shipping ports on the west coast.

Because Grays Harbor was not the primary consumer of most of its wood products, transportation of the milled and raw lumber played a key role in the development of the region's industry and local economy. The two primary modes of transportation were by ship or by rail.

Initially, most finished lumber was shipped by water to distant customers, despite the difficulties of navigating Grays Harbor. The first dredging of the Grays Harbor Navigation Channel began in 1889. Regular dredging to provide safe passage for ships continued well into the 20th century and remains a significant issue today.

The Northern Pacific Railroad was the first major rail line to serve the Grays Harbor region, spurring the early growth of Aberdeen, Hoquiam, and other communities that competed to become the railroad's west coast terminus. The first portions of the Northern Pacific Railroad's Grays Harbor Branch were completed in 1892. In 1898, the Northern Pacific Railroad extended the Grays Harbor Branch rail line an additional 4.6 miles over the Wishkah and Hoquiam Rivers, through central Aberdeen to Hoquiam. The railroad was later connected to three transcontinental routes. Today, the route is operated by PS&P and services the Port of Grays Harbor (Port) and other area industries.

The Port was first established in 1911. Initial improvements included dredging navigation channels, adding piers and slips, filling tidelands, adding a railroad avenue in Hoquiam, and removing two bends in the Wishkah River. Terminal 1, the Port's first public terminal facility, was constructed at Cow Point in 1921 and 1922. It was purposely located between Hoquiam and Aberdeen to prevent disputes over which town would benefit more from future improvements. The dock at Cow Point, known as Pier 1, opened on September 22, 1922. It featured a 2000-foot by 300-foot dock with a slip along its west side (Slip 1). A second slip (Slip 2) was constructed east of the new pier shortly thereafter.

New development at the Port continued through the 1920s. The Great Depression abruptly ended the region's lumber boom, but the industry recovered in the postwar period. The Port established an industrial development district in the 1960s to attract new commercial and industrial industries to the area. This effort included the construction of new warehouses, manufacturing plants, and other facilities in the previously undeveloped lands around Terminal 1. The Port pursued further development in the late 1970s and 1980s, significantly altering waterfront facilities. The Port began the construction of Terminal 2 in 1979 and coordinated with the U.S. Army Corp of Engineers (USACE) to dike and fill Slips 1 and 2. Slips 1 and 2 were diked and filled by the Port beginning in 1983 to create new areas for development.

3.11.4.2 Archaeological Resources

This section describes the findings of archaeological investigations at and near the project site, considers the area's landform development, and identifies the types of archaeological resources that may occur along the PS&P rail line and in and along the shoreline of Grays Harbor.

Project Site

The project site is located in what were tidelands[4] prior development of the Port's Terminal 1 in the early 1920s (Boersema 2013: 6-7). The tidelands were initially formed by the inundation of the Grays Harbor basin due to sea level rise over several thousand years and subsequent sedimentation caused by the Chehalis River and tidal effects. Beginning in the early 20th century, widespread and deep dredge and fill activities within and along the shoreline of Grays Harbor physically altered its elevation and disturbed its naturally deposited soils. Figure 3.11-1 shows the historical shoreline near the project site.

[4] Tidelands are submerged lands with beaches that are exposed and submerged with the movement of the tides.

Figure 3.11-1.Historical Shoreline in the Vicinity of the Project Site

These changes are evident in comparisons of the U. S. General Land Office's 1860 cadastral survey map of the region and later environmental studies conducted by USACE in 1978 for the construction of Terminal 2, the expansion and modification of Terminal 1, and, in 1989, for proposed dredging and navigation channel improvements. Each of these studies provides information on changes to landforms within the project site (U. S. General Land Office 1860a, 1860b; U. S. Army Corps of Engineers 1978a, 1978b, 1989).

Beginning in the early 1920s, the Port constructed Terminal 1 over the tidelands at Cow Point, which involved both dredging and the placement of fill. As shown in Figure 3.11-2, Terminal 1 originally included a long dock with an excavated slip along its west side (Slip 1) and a second slip (Slip 2) along its east side (Ott 2010; Boersema 2013: 11–12). Both slips were diked and filled with dredge spoils from 1983 to 1992 (Boersema 2013: 11–12); Figure 3.11-3 shows conditions in 1984. Environmental impact statements prepared in response to the Port's application for these fill activities identified the fill depths of Slip 1, where the project site is located. Prior to diking, Slip 1 had maximum depth of 30 feet below mean lower low water (-30 feet) or 48 feet below the current ground surface with a mean depth of 10 feet below mean lower low water (-10 feet) or 28 feet below the current ground surface (U.S. Army Corps of Engineers 1989: 3-3, 3–15).

Geotechnical investigations in the project site performed from 1995 to 1996 and in 2006 and the subsurface archaeological investigations conducted within the project site confirmed the depths of prior dredging and fill activities in the area of Slip 1. The geotechnical investigations revealed the

presence of dredge fill to a depth of around 23 meters (75 feet) below the ground surface, although this appears to be significantly deeper than the depth of the dredged slip reported by USACE in 1989. Native soils were documented below the dredge fill to a terminal excavated depth of 39.5 meters (130 feet). Other prior geotechnical investigations performed in the project site vicinity indicate that native soils transition into dense alluvial gravels and sands—inferred to be glacial outwash—at depths ranging from 39.5 meters (130 feet) to 43 meters (140 feet) (Heller and Phelps 2014).

The subsurface archaeological investigations revealed no buried surfaces or archaeological resources in the project site. Although fill deposits were documented across the entirety of the project site, the terminal depth of these deposits was ambiguous. In many instances, there were no clear attributes that could be used to differentiate the fill from underlying native soils. This is most likely because most of the deposits used to fill Slip No. 2 consisted of native soils dredged from an area just east of the project site and therefore had comparable attributes. The results of the subsurface archaeological investigations, combined with a review of previous U.S. Coast and Geodetic Survey maps and fill plans indicates that fill deposits likely range from 15 to 34 feet in thickness. Based on the depth and the presence of in-situ bivalves, these deposits were considered native intertidal flat deposits. Although the terminal depth of these deposits was not established during subsurface investigations, previous geotechnical and geoarchaeological investigations in the study area vicinity, indicate that the interface is located between 120 and 130 feet below the ground surface.

No documented archaeological resources are known to exist in the project site and the potential to encounter yet undocumented archaeological sites is considered low. This conclusion is based on archaeological investigations conducted at and near the project site and consideration of the area's landform development.

Figure 3.11-2. Aerial View of Port of Grays Harbor circa 1920

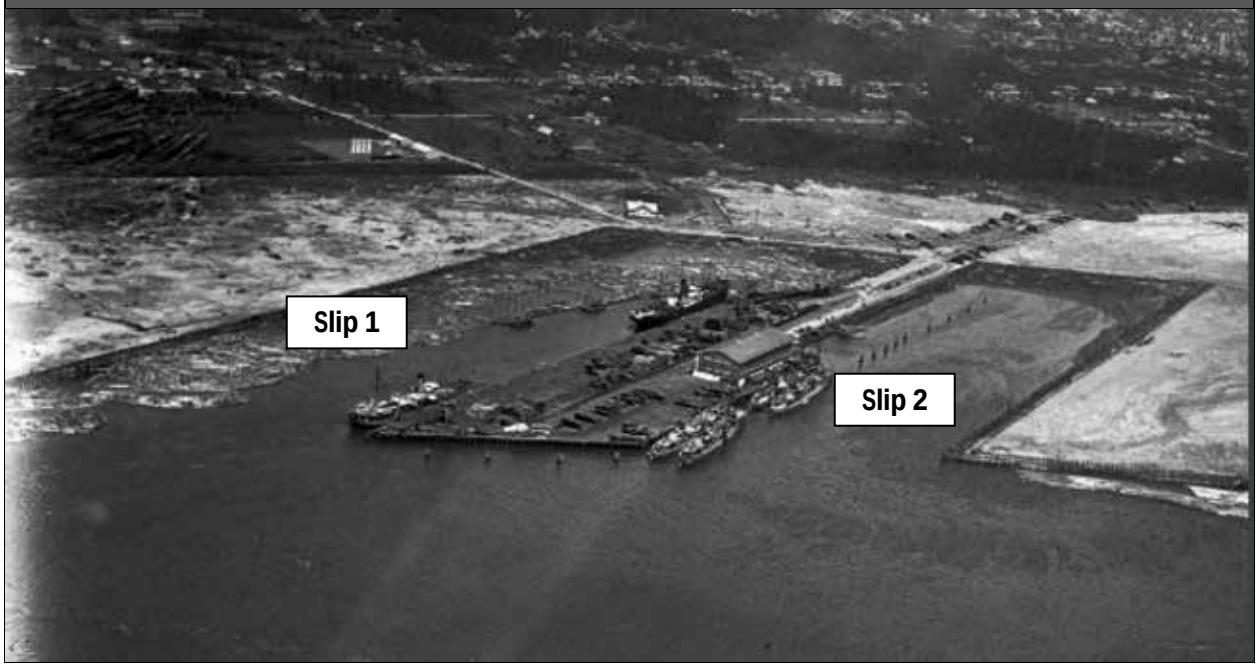


Figure 3.11-3. Aerial View of Port of Grays Harbor circa 1984

PS&P Rail Line

The precontact and ethnographic contexts of the Grays Harbor area indicate that the region was important for habitation and resource gathering, and as an inland travel corridor. Several types of archaeological resources may occur along the PS&P rail line, including historical agriculture, homestead, logging, and railroad-related properties, and precontact village sites, rock shelters, pictographs or petroglyphs, shell middens or mounds, cemeteries or burials, lithic scatters, rock alignments or stacked rock features, and fish weirs or traps.

Grays Harbor

Precontact peoples used the upland shorelines of Grays Harbor for habitation, plant gathering, and hunting; and the waters of Grays Harbor for fishing and shellfish harvesting. Of these activities, habitation and facility-based fishing tend to leave the most robust archaeological traces. Archaeological resources within and along the shoreline of Grays Harbor may consist of archaeological sites or culturally significant properties, such as historic water structures, precontact village sites, shell middens or mounds, cemeteries or burials, lithic scatters, and fish weirs or traps.

3.11.4.3 Culturally Significant Properties

No culturally significant properties are known to exist in the project site or its immediate vicinity. At least two ethnographically named places are located within a few miles, but outside, of the project site. These places are the xwəʼqwyamc (the Hoquiam River) and Ho-kwa-im-its (a village located at the mouth of the Hoquiam River). A third ethnographically named place, Cow Point is a portion of the project site, but the primary fishing area or camp is located east of the project site. (James and Martino 1986; Miller 2009). Although other areas of ethnographic significance are undoubtedly located near the study area, they do not appear to be documented in the available literature.

Additional information on tribal resources is presented in Section 3.12, *Tribal Resources.*

3.11.4.4 Historic Resources

This section describes the results of the historic resources survey of the project site and immediate vicinity and the types of historic resources that may be present along the PS&P rail line and in and along the shoreline of Grays Harbor.

Project Site

As described above, the project site has been subject to dredge and fill activities since the early 20th century and, since the 1970s, to industrial development.

The historic resources survey identified 18 buildings and structures on and immediately surrounding the project site. Four properties were identified as being 45 years of age or older: the Longshore Federal Credit Union building at 3107 John Stevens Way, erected in 1960; the Paneltech Products, Inc. Warehouse at 2999 John Stevens Way, built in the mid-1940s; the California Petroleum Corporation Warehouse at 2519 West 1st Street (also known as 2421 West 1st Street), built circa 1925; and Warehouse E on the Westway Terminals LLC property at 3128 Port Industrial Road, constructed in 1962. The Longshore Federal Credit Union building and the California Petroleum Corporation Warehouse were previously identified and evaluated as not eligible for the National Register of Historic Places by a prior cultural resources study (Schneyder et al. 2010). None of these buildings or structures was determined to be eligible for the National Register of Historic Places or Washington Heritage Register.

PS&P Rail Line

The railroad was important to the development of the region. Several types of historic resources occur along the PS&P rail line, including railroad-related structures, single-family and multifamily residences, and commercial and industrial properties.

Grays Harbor

Although a detailed evaluation of historic resources was not completed for the Grays Harbor shoreline, affected resources might consist of single-family and multifamily residences, commercial and industrial properties, and maritime-related resources.

3.11.5 What are the potential impacts on cultural resources?

This section describes impacts on cultural resources that could occur in the study area. Potential impacts of the no-action alternative are described first, followed by potential impacts of the proposed action.

3.11.5.1 No-Action Alternative

Under the no-action alternative, the applicant would continue to operate its existing facility as described in Chapter 2, Section 2.1.2.2, *Existing Operations*. Although the proposed action would not occur, it is assumed that growth in the region would continue under the no-action alternative, which could lead to development of another industrial use at the project site within the 20-year analysis period (2017 to 2037). Such development could result in impacts similar to those described below for the proposed action.

3.11.5.2 Proposed Action

This section describes the impacts that could occur in the study area as a result of construction and routine operation of the proposed action. First, this section describes impacts from construction of the proposed action. It then describes impacts of routine operation at the project site and of routine rail and vessel transport to and from the project site.

Construction

Construction at the project site would occur on the upland flats adjacent to the current shoreline. No in-water construction is proposed. No significant or protected cultural resources—archaeological resources, historic resources, or culturally significant properties—are known to exist on or in the project site. Therefore, construction of the proposed action would not be expected to affect any cultural resources.

Because the project site is known to have been subject to previous widespread and deep dredging, there is limited potential to encounter undocumented archaeological sites. However, as described in Chapter 2, *Proposed Action and Alternatives*, construction of the proposed action would require pile driving to a depth of approximately 75 feet. Although the likelihood of encountering cultural resources is anticipated to be low, based on the results of the subsurface archaeological investigations conducted in and near the project site, undocumented resources could exist in native soil below 36 feet. The preparation of an unanticipated discovery plan, as described in Section 3.11.7.2, Applicant Mitigation, would address the discovery of previously unidentified archaeological resources during construction.

Operations

This section describes impacts that would occur as a result of routine operations at the project site, rail transport along the PS&P rail line, and vessel transport through Grays Harbor.

Onsite

Routine onsite operations would occur within the boundaries of the project site and would be similar in nature to existing operations at the project site. Because there are no known significant or

protected cultural resources at the project site and because proposed operations would not involve ground-disturbing activities, routine onsite operations would have no impacts on cultural resources.

The operations would be similar to existing conditions. Increased traffic could affect resources located nearby as a result of visual and audible intrusions or vibrations. However, as discussed in in Section 3.7, *Noise and Vibration*, the proposed action would not increase noise or vibration on site that would adversely affect historic resources. As noted above, potential impacts related to increased risks associated with rail and vessel transport along the PS&P and within Grays Harbor are addressed in Chapter 4, *Environmental Health and Safety*.

Rail

Rail transport of bulk liquids under the proposed action would occur along the existing PS&P rail line. Increased rail traffic along the PS&P line under the proposed action could affect resources located nearby as a result of visual and audible intrusions or vibrations. However, as discussed in Section 3.7, *Noise and Vibration*, the proposed action would not increase vibration along the PS&P rail line that would adversely affect cultural resources. Moreover, if resources along the line contain prominent and distinctive character-defining visual features, the alteration of the views from increased traffic would not affect these resources to the extent that they would no longer be considered historically significant (Section 3.9, *Aesthetics, Light, and Glare*). Therefore, impacts on historic and cultural resources as a result of routine rail transport under the proposed action are considered low.

Vessel

Vessel transport of bulk liquids under the proposed action would occur within the existing navigation channel. As noted in Section 3.3, *Water*, increased vessel traffic under the proposed action could result in an incremental increase in shoreline erosion. Onshore resources could be affected if shoreline erosion altered or destroyed the landforms on or in which resources are located.

3.11.6 What required permits and plans apply to cultural resources?

No required permits or plans apply to cultural resources.

3.11.7 What mitigation measures would reduce impacts on cultural resources?

This section describes the applicant mitigation that would reduce impacts on cultural resources from construction and routine operation of the proposed action.

3.11.7.1 Applicant Mitigation

The applicant will implement the following mitigation.

- To address the risk of disturbing undocumented cultural resources, the applicant will prepare an unanticipated discovery plan to address previously unidentified archaeological resources should any be discovered during the construction of the proposed action. The applicant will submit the plan to DAHP before construction. The plan will contain provisions requiring that if

archaeological resources are uncovered during excavations, construction activities will cease immediately and the applicant will notify the City of Hoquiam, DAHP, the Quinault Indian Nation, and the Confederated Tribes of the Chehalis Reservation. In such cases, the applicant will provide for a site inspection and evaluation by a professional archaeologist to ensure that all possible valuable archaeological data are properly salvaged or mapped.

3.11.8 Would the proposed action have unavoidable and significant adverse impacts on cultural resources?

Compliance with the applicable regulations along with implementation of the mitigation measure described above would reduce impacts on cultural resources. There would be no unavoidable and significant adverse impacts. Potential impacts related to spills are addressed in Chapter 4, *Environmental Health and Safety*.

3.12 Tribal Resources

In this document, tribal resources refer to the collective rights and access to traditional areas and times for gathering resources associated with a tribe's sovereignty or formal treaty rights. These resources may include plants or fish used for commercial, subsistence, and ceremonial purposes. Tribal fishing resources include catch in freshwater, Grays Harbor, and ocean fisheries.

This section describes tribal resources in the study area, including resources important to the Quinault Indian Nation (Quinault) and the Confederated Tribes of the Chehalis Reservation (Chehalis) as identified by the tribes and agencies. It then describes impacts on tribal resources that could result under the no-action alternative or as a result of the construction and routine operation[1] of the proposed action. Finally, this section presents any measures identified to mitigate impacts of the proposed action and any remaining unavoidable and significant adverse impacts.

3.12.1 What is the study area?

The study area for tribal resources consists of tribal resources on and near the project site that could be affected by construction and routine operation at the project site. The study area also includes tribal resources that could be affected during routine rail transport along the Puget Sound & Pacific Railroad (PS&P) [2] rail line and vessel transport through Grays Harbor out to 3 nautical miles from the mouth of the harbor.

3.12.2 What laws, regulations, and treaty rights apply to tribal resources?

Laws and regulations for determining potential impacts on tribal resources are summarized in Table 3.12-1. More information about these laws and regulations is provided in Appendix B, *Laws and Regulations*.

[1] Chapter 4, *Environmental Health and Safety*, addresses the potential impacts from increased risk of accidents (e.g., storage tank failure, train derailments, vessel collisions) and related consequences (e.g., release of crude oil or other proposed bulk liquids).

[2] The PS&P rail line refers to the rail line between Centralia and the project site.

Table 3.12-1. Laws, Regulations, and Treaty Rights for Tribal Resources

Laws, Regulations, Court Cases, and Treaties	Description
Federal	
Treaty of Olympia of 1856	Set aside reservation land and reserve fishing, gathering and hunting rights for the Quinault Indian Nation throughout their usual and accustomed grounds.
Magnuson-Stevens Fishery Conservation and Management Reauthorization Act of 2006 (16 U.S.C. 1801 *et seq*.)	Granted the States of California, Oregon, and Washington the interim authority to manage Dungeness crab in federal coastal waters (3 to 200 nautical miles offshore). Includes provisions for treaty-reserved rights in Washington State and comanagement of crab.
Pacific Coast Treaty Indian Fisheries, Wildlife and Fisheries (50 CFR 660.50)	Describes the regulatory process to accommodate treaty-reserved rights for the harvest of groundfish.
United States v. Winans, 198 U.S. 371 (1905)	U.S. Supreme Court held that the Treaty with the Yakima of 1855, and similar treaties, protects tribal access rights to fishing, hunting, and other privileges on off-reservation lands.
United States v. Washington, 384 F. Supp. 312 (W.D. Wash. 1974) "Boldt Decision"	Federal district court interpreted the rights of treaty tribes to take fish in their "usual and accustomed places in common with all citizens" to mean that treaty tribes have a treaty-reserved right to harvest 50% of the harvestable portion of fish.
Washington v. Washington State Commercial Passenger Fishing Vessel Association, 443 U.S. 658 (1979)	U.S. Supreme Court upheld the 1974 Boldt Decision.
United States v. Washington, 873 F. Supp. 1442 (1994) "Rafeedie Decision"	Federal district court concluded that treaty rights include shellfish and that tribes are entitled to 50% of the harvestable shellfish on most Washington State beaches.
State	
Washington Department of Fish and Wildlife Grays Harbor Basin Salmon Management (Policy C-3621)	Advances the conservation and restoration of Grays Harbor wild salmon and maintains or enhances economic well-being and stability of fishing industry. Quinault Indian Nation fisheries are not subject to this policy, but this policy influences negotiations between the Quinault Indian Nation and State on number of fish available for harvest.
Washington Department of Fish and Wildlife Hatchery and Fishery Reform (Policy C-3619)	Advances the conservation and recovery of wild salmon and steelhead by promoting and guiding the implementation of hatchery reform. Quinault Indian Nation fisheries are not subject to this policy, but this policy influences negotiations between the Quinault Indian Nation and State on number of fish produced from hatcheries in Grays Harbor, number of fish available for harvest, and fishing gear types.
Washington Department of Fish and Wildlife North of Falcon Policy (Policy C-3608)	Guides conservation, allocation, in-season management, and monitoring associated with the annual salmon fishery planning process.
Local	
No local laws, regulations, or treaties apply to tribal resources.	

3.12.3 How were impacts on tribal resources evaluated?

This section describes the sources of information and methods used to evaluate impacts on tribal resources.

3.12.3.1 Information Sources

Information used to evaluate existing tribal resources was obtained from the following sources.

- Communication between the Chehalis Tribe and Washington State Department of Ecology (Connelly pers. comm.)
- Quinault Indian Nation response to treaty fisheries in the Grays Harbor (Quinault Indian Nation 2015)
- Information about Chehalis Tribe and fisheries (Chehalis Tribe 2015)
- Information about Quinault Indian Nation and fisheries (Quinault Indian Nation 2014a)
- Treaty of Olympia (Northwest Indian Fisheries Commission 2015)
- Testimony of James E. Jorgenson to the Shorelines Hearing Board (Jorgenson pers. comm.)
- Communication from Quinault Ocean Fishers Committee responses to the 2014–15 seasonal regulation about the Grays Harbor commercial crabbing season (Quinault Indian Nation 2014b)
- Communication from Quinault Ocean Fishers Committee regarding the 2014–15 Seasonal Regulation about the Grays Harbor ceremonial and subsistence crabbing season (Quinault Indian Nation 2014c)
- Imperium Renewables, Inc. and Westway Terminals LLC Vessel Traffic Impact Analysis for Imperium and Westway (WorleyParsons 2014)
- Letter from EarthJustice on the Westway Expansion (EarthJustice 2013)
- Information about treaty rights in the Pacific Northwest (Columbia Inter-Tribal Fish Commission et al. 2013)
- *Grays Harbor and Native Americans* (James and Martino 1986)
- Summary of tribal (treaty and nontreaty) and nontribal commercial and recreational fisheries in Grays Harbor and the Chehalis River (Scharpf pers. comm. March 24, 2015)
- Economic Impacts of Crude Oil Transport on the Quinault Indian Nation and Local Economy (Resource Dimensions 2015)

3.12.3.2 Impact Analysis

Impacts on tribal resources were assessed by evaluating how the proposed action could disrupt access to tribal resources in the study area. The impact analysis considered fishing and gathering information provided by the tribes and agencies, including practices and areas used by Quinault and Chehalis tribal members, typical methods to access these areas, gear used in these fisheries, timing of fisheries, and catch by fisheries. The impact analysis evaluated how construction and routine operation of the proposed action could reduce the amount of time available to fish, change the time when fishers could deploy gear, or exclude members from fishing areas typically fished by Quinault or Chehalis tribal members.

3.12.4 What tribal resources are in the study area?

This section describes the tribes and tribal resources in the study area that could be affected by construction and routine operation of the proposed action. This section provides the general context for tribal resources in the study area and describes tribal resources on the project site, along the PS&P rail line, and in and along the shoreline of Grays Harbor.

3.12.4.1 Tribes

The vicinity of the study area was traditionally inhabited by the Hoquiam and Wishkah people and their ancestors, who spoke the Lower Chehalis dialects of the Salish language. Both groups lived along the banks of the Hoquiam and Wishkah Rivers. The waters near the study area—including the mouth of the Hoquiam River—were also used seasonally by the Quinault people, who spoke the Quinault dialect of the Salish language (Gibbs 1877; Curtis 1913; Hajda 1990). The waters of Grays Harbor, the Chehalis River, and other streams entering Grays Harbor were traditionally, and continue to be, important fishing areas for Native American tribes in the region, while the Grays Harbor shores continue to be productive hunting and plant-gathering areas.

Pacific Coast treaty tribes with a marine fish allocation are the Makah, Quileute, Hoh, and Quinault. Of these, the Quinault is the only treaty tribe with usual and accustomed areas within and adjacent to Grays Harbor. Other treaty tribes may use Grays Harbor as a moorage from which they access usual and accustomed areas but because those areas are not within Grays Harbor, they are not discussed further.

Quinault Indian Nation

The Quinault Indian Nation is a federally recognized Indian tribe that consists of the Quinault and Queets Tribes and descendants of five other coastal tribes: Quileute, Hoh, Chehalis, Chinook, and Cowlitz (Quinault Indian Nation 2014a). The Quinault Indian Reservation is located on the southwestern corner of the Olympic Peninsula. The reservation is more than 208,150 acres of land and includes 23 miles of ocean beach. The reservation was established in 1855, when the tribes and bands that now make up the Quinault Indian Nation ceded land to the United States in the Treaty of Olympia (Quinault Indian Nation 2014a).

The Quinault Indian Nation has treaty-reserved rights to fishing and gathering. The Quinault Indian Nation is a signatory to the Treaty of Olympia (1856). The treaty reserved a right to take fish at its "usual and accustomed fishing grounds and stations" and the privilege of gathering, among other rights, in exchange for ceding lands the tribe historically roamed freely (Northwest Indian Fisheries Commission 2015). Grays Harbor is within the Quinault usual and accustomed fishing and gathering areas.

The Quinault have lived near and depended on Grays Harbor for generations. They were called the canoe people because of the importance of canoes to every aspect of tribal life (Storm and Capoeman 1990: 45). Canoes were used for travel in the ocean, bays, estuaries, and rivers. The Quinault constructed ocean-going canoes to travel between villages along the coast and to hunt and fish. They constructed shovel-nosed, slack-water canoes to navigate rivers entering Grays Harbor and the Quinault River.

Primary villages on the Quinault Indian Reservation are Taholah at the mouth of the Quinault River and Queets at the mouth of the Queets River. These villages are on traditional village sites. Quinault

fishers are dependent on Grays Harbor to access ocean fisheries because both villages lack a harbor. The Quinault have treaty-reserved commercial, subsistence, and ceremonial fisheries (Resource Dimensions 2015: 55-59). Quinault ocean fisheries include salmon (Chinook and coho), halibut, Dungeness crab, lingcod, rockfish sablefish, and sardines. Grays Harbor gillnet fisheries include salmon (Chinook, coho, and chum), steelhead, and white sturgeon. Quinault treaty commercial and subsistence diggers harvest razor clams from beaches from Grays Harbor north. The Chehalis, Humptulips, and several other smaller rivers entering the Grays Harbor estuary provide the freshwater and estuarine habitat that supports Chinook, chum, and coho salmon and steelhead of critical importance to the Quinault. Grays Harbor nourishes other species of fish important to the Quinault fisheries such as white sturgeon and Dungeness crab.

Quinault weavers have gathered materials from the Grays Harbor area for many generations. Sweetgrass, cattail, and other grasses and willow gathered from Bowerman Basin in Grays Harbor are used to weave baskets and mats and for ceremonial purposes. Weaving is as integral to contemporary Quinault culture as it was in the past (Resource Dimensions 2015:57).

As a treaty tribe, the Quinault manage their fisheries and are responsible for regulating its fishers both on and off reservation. The Quinault Indian Nation is a comanager with the Washington Department of Fish and Wildlife for salmon, steelhead, and Dungeness crab. Each year the tribe and state meet to determine how many fish and crab can be caught in fisheries. The tribe and state then negotiate fishery schedules to ensure an equitable share of the catch. The process for comanagement of the ocean and freshwater salmon fisheries has evolved over the years and now incorporates preseason meetings and use of model based predictions of abundance, number of fish available for harvest, and catch. Grays Harbor salmon and steelhead fishery openings and predicted catch by week and season are based on models that consider fish timing, level of effort (number fishers participating in the fishery), expected catch, and previous years' fishery data. Once the tribe and state reach agreement on fisheries, in the spring they release a preseason summary of planned fisheries and predicted catch (the planned fisheries includes weekly schedules of weeks and days open).

The Quinault post tribal fishery regulations on their website reporting days and areas opened by statistical week (Sunday through Saturday) for their fishers. The Washington Department of Fish and Wildlife also posts planned openings of tribal fisheries on their website to inform recreational fishers when nets may be deployed. The tribe is responsible for enforcing Quinault fishing regulations. The tribe actively monitors in-season catch during each opening. Summaries of weekly and annual catch are shared with the Washington Department of Fish and Wildlife as the fishery progresses and annual catch data are shared at the end of the season. An important aspect of fisheries management is the in-season review of catch and updated estimates of number of harvestable fish. The tribe and state can adjust fishery schedules in season if the actual number of fish and harvestable abundance are not as forecast or if bad weather has disrupted fishing schedules (Scharpf pers. comm. May 26, 2015). These updates may result in adjustments to fishery schedules or closures to protect certain species, or they may add a fishing day in the same week (if bad weather affected a fishery), a run, or additional fishery openings if harvestable abundance is more than planned.

The Quinault began to exert their treaty-reserved right for Dungeness crab when treaty-reserved rights were extended to shellfish in a ruling by Judge Rafeedie in 1994 (*United States v. Washington, 873 F. Supp. 1422*). The States of Washington, Oregon and California and treaty tribes comanage the coastal Dungeness crab fishery. The four coastal treaty tribes (Makah, Quileute, Hoh, and Quinault)

have designated usual and accustomed ocean fishing areas for crab. The treaty tribes and state determine the amount of harvestable crab for each area, of which the treaty tribes are entitled to 50%. The tribes manage their fisheries specific to their usual and accustomed area, setting seasons, issuing permits, regulating number of pots that can be deployed, and recording catch.

Management of treaty-reserved marine fish harvest is at the international or federal level. Halibut are managed at the international level with the International Pacific Halibut Commission regulating harvest. Other marine fish such as sablefish, groundfish (rockfish, pacific cod, lingcod, and whiting) are managed through the Pacific Fisheries Management Council. The council and coastal treaty tribes (Makah, Quileute, Hoh, and Quinault) have formal harvest allocations for sablefish and whiting (Pacific Fishery Management Council 2014). Treaty allocation of other groundfish species is made through annual determination by the council (50 Code of Federal Regulations [CFR] 660.50).

Confederated Tribes of the Chehalis Reservation

The Chehalis are a federally recognized Indian tribe in rural southwest Washington State. The Chehalis Reservation is located on the Chehalis River at the mouth of the Black River near Oakville, Washington, southeast of Hoquiam. The 4,849-acre reservation was established in 1864 by secretarial order. The reservation is rural agricultural with low-density residential, farms, open prairies, forest, and wetlands. In the late 1800s, the reservation had a boarding school for tribal children, numerous home sites, and a small tribal center for community meetings and events. The 2014 enrolled population of the Chehalis Tribe was 894. The Bureau of Indian Affairs Labor Force Report for 2010 shows a service population (enrolled and nonenrolled Indians living on and near the reservation) of 3,625 individuals. Tribal government has grown considerably in the last 20 years to provide services to the many Native Americans living on or adjacent to the reservation (Connelly pers. comm.).

Preservation of tribal land and culture is essential for the perpetuation of the Chehalis people. The importance of the land to the tribe cannot be overstated. It provides the living space, the sacred and cultural sites, and the natural resources that sustain the Chehalis people and culture. It provides spiritual and physical sustenance, and the means for economic self-sufficiency. Many tribal members hunt and fish to supplement their incomes (commercial harvest), to provide sustenance for their families, and for cultural reasons (subsistence and ceremonial harvest). Historically, tribal members were expert fishers and paddlers of shallow shovelnose canoes. Women wove fine baskets, clothing, canoe mats, and even diapers using grasses, bark, and reeds collected from the area. Men carved dugout canoes, beautiful masks, and ceremonial items from red cedar and other trees (Connelly pers. comm.).

The location of the reservation at the confluence of the Chehalis and Black Rivers provides a prime fishing area for the salmon and steelhead returning to the Chehalis River. Salmon and steelhead have been important to their diet for centuries. The present-day Chehalis commercial, subsistence, and ceremonial fishery is limited to the portions of the Chehalis and Black Rivers on the Chehalis Reservation.

3.12.4.2 Project Site

The project site is located on property owned by the Port of Grays Harbor but has been under lease agreement and managed by the applicant for several years. Near the dock, there are tribal fishing areas, discussed below in Section 3.12.4.4, *Grays Harbor*. There are no known tribal resources on the upland portion of the project site.

3.12.4.3 PS&P Rail Line

Quinault Indian Nation

Along the PS&P rail line, the primary area for tribal fishing is the lower Chehalis River. The Quinault fishers harvest salmon, steelhead, and white sturgeon in the lower Chehalis River from the mouth to approximately the confluence with the Wynoochee River (Figure 3.12-1). Species and runs harvested in-river are the same as harvested in Grays Harbor (fall Chinook, spring Chinook, coho, and chum salmon, winter steelhead, and white sturgeon). Fisheries in the Chehalis River are open on the same weeks and days as in Grays Harbor.

Quinault fishers can elect to deploy gillnet fishing gear in the Chehalis River or Grays Harbor. The in-river fishery includes a combination of drifting nets from smaller boats and setting nets secured to the shore (Quinault Indian Nation 2015:11). Drift gillnet fishing entails the fisher deploying the net from the bow or stern of the fishing vessel perpendicular to the channel. Fishers attempt to deploy their gillnets to cover as much of the channel as possible to maximize catch. The net is allowed to drift with the currents, sweeping the channel for fish. Fishers need to actively monitor the net and adjust the net position in the channel to avoid known hazards (logs, shallow areas, docks, and other vessels). Set-net gillnet fishing entails the fisher securing one end of the net to the shore and anchoring the other end in the channel to keep the net perpendicular to the channel. A set net may be deployed for several hours at a time during an opening. The fisher may monitor the net and remove fish periodically. Set-net fishing locations are well established and fishing grounds are allocated to specific fishers. Set-net sites are primarily in the Chehalis River and other rivers entering Grays Harbor. Set nets that may be deployed in Grays Harbor are on the edges of the Grays Harbor Navigation Channel and do not obstruct vessel traffic.

Set-net fishers access their fishing sites from shore when direct vehicle access to their site is available. If shore access is not available, fishers access their sites by small boat from a nearby boat launch or the Quinault Pride dock in Aberdeen. Annual harvest from the Chehalis in-river fishery is included in Grays Harbor catch summarized in Section 3.12.4.4, *Grays Harbor.*

Chehalis Tribe

The Chehalis in-river fishery is entirely on the reservation and managed by the Chehalis (Figure 3.12-1). Because the Chehalis are a nontreaty tribe, their commercial fishery is limited to the portion of the rivers on the reservation. Primary commercial and subsistence fisheries are in the fall and winter. The fall fishery harvests coho and Chinook salmon. The winter fishery harvests steelhead. Depending on abundance of spring Chinook returning to the river, there may be a spring Chinook fishery. The number of harvestable spring Chinook is low and most fish are for subsistence or ceremonial consumption (Connelly pers. comm.). A recreational fishery also occurs on the reservation with a tribal fishing license. Chehalis tribal members must have a valid Washington State fishing license to fish off-reservation and must follow state regulations.

The nontreaty tribal harvest of salmon and steelhead is based on a sharing formula between the state and the tribe. The allowable catch of salmon and steelhead by Chehalis tribal members is calculated from the nontreaty harvestable share returning to Grays Harbor. The state and tribe have an agreement to share equally the nontreaty harvestable portion of fish returning to spawning areas upstream of the Chehalis Reservation boundary (Hughes pers. comm.). The sharing formula applies

to fall Chinook, spring Chinook, coho, and steelhead. All chum salmon returning to the Chehalis River spawn downstream of the Chehalis Reservation and are not included in the sharing formula.

Access to fishing sites by Chehalis tribal members is by small boats and bank access to set-net fishing locations. The number of fish available for harvest is developed from the preseason run forecast. Annual records of number of fish harvested are not available for the Chehalis fisheries.

3.12.4.4 Grays Harbor

Quinault Indian Nation

As described in Chapter 3.5, *Animals*, Grays Harbor and its tributaries provide habitat for various fish species, including salmonids, sturgeon, lamprey, groundfish, and forage fish. The Chehalis River is the largest tributary that drains directly into Grays Harbor. Six species of salmonids are known to migrate and rear in portions of Grays Harbor and its tributaries. This waterway and its primary tributaries support tribal, commercial, and recreational fishing. Grays Harbor has a history of vessel operations involving large commercial vessels transporting a variety of goods and materials in the area.

As noted above, the Quinault traditionally used the Grays Harbor area for collecting weaving materials, fishing, hunting, and as a gathering place. Quinault fishers fish in Grays Harbor for salmon, steelhead, and sturgeon using drift and set gillnets and for Dungeness crab using pots. Ocean fisheries adjacent to Grays Harbor are for Dungeness crab (pots), halibut (longline), sablefish (longline, pots, and trawl gear), groundfish such as rockfish, pacific cod, whiting (longline and trawl gear) and ocean Chinook and coho salmon (troll gear). Grays Harbor is home port for fishing vessels in ocean fisheries and is where fishers offload catch for these fisheries. The Quinault also manage razor clams for commercial and subsistence harvest on beaches on and off the reservation adjacent to Grays Harbor.

Sweetgrass, cattail, and other grasses that grow in either freshwater or brackish marshes on the flats of the intertidal zone, such as those areas along the shoreline of Bowerman Basin and adjacent saltmarshes in the Grays Harbor National Wildlife Refuge, have been gathered by Quinault weavers for many generations (James and Martino 1986:71–76). These grasses are collected in July and August (James and Martino 1986:71–76). According to Jones (2012 in Resource Dimensions 2015: 59), the gathering of plant materials for basket weaving was an important element of traditional Quinault culture. This tradition remains an important component of tribal culture with extended families and friends gathering material for weaving (Resource Dimensions 2015:59).

Quinault fishers currently harvest salmon, steelhead, white sturgeon, and Dungeness crab in Grays Harbor. In addition, Quinault fishers use Gray Harbor to access ocean fisheries and offload catch from these fisheries.

Quinault Pride Seafood processes and markets Quinault-caught seafood products. It is owned by the Quinault Indian Nation, which requires fishers to sell most of their catch to Quinault Pride Seafood (Quinault Indian Nation 2014a) and authorized buyers; depending on the fishery, regulations may allow a small portion to be sold directly to the consumer. Quinault Pride Seafood operates a processing plant at Taholah and Westport and maintains a dock to moor boats and offload catch in Aberdeen (Figure 3.12-1). Quinault Pride Seafood may operate a fish tender anchored in the Chehalis River and buyers at various boat launches to offload catch during periods of peak salmon abundance. The Westport plant was purchased by the Quinault Indian Nation in 2014 (Resource

Dimensions 2015:5). Westport is the primary moorage for fishing vessels participating in ocean fisheries (Quinault Indian Nation 2015:12).

All commercial catch must be reported to the tribal fish management organization. The Quinault do not maintain records of subsistence or ceremonial catch of salmon, steelhead, and white sturgeon (Resource Dimensions 2015: 78). The Quinault maintain records of subsistence catch for crab, razor clams, and marine fish. Subsistence harvest ranges from 5 to 20% of reported commercial catch of salmon, steelhead, and sturgeon, based on interviews with fishers (Resource Dimensions 2015:78).

The following discussion focuses on the areas, species, and practices for commercial and subsistence harvest of salmon, steelhead, sturgeon, and crab in Grays Harbor. This is followed by a discussion of use of Grays Harbor to access marine fisheries and fish caught in these fisheries.

Salmon, Steelhead, and White Sturgeon—Grays Harbor Gillnet Fisheries

Quinault treaty gillnet fisheries for salmon, steelhead, and sturgeon can occur nearly year-round in Grays Harbor. Grays Harbor fisheries target salmon and steelhead adults returning to the Chehalis River and other streams entering Grays Harbor. White sturgeon caught in Grays Harbor are from river systems outside of Grays Harbor. White sturgeon and green sturgeon use the Grays Harbor estuary for foraging.

The Grays Harbor annual management cycle is divided into three seasons. The most intense fishery (maximum number of participants) and largest catches occur during the fall fishery from September to mid-November (Quinault Indian Nation 2015:2). Species harvested during the fall fishery are coho, chum, and fall Chinook salmon.

The winter fishery begins in late November and extends to mid-April. This fishery is directed at winter steelhead and more fishers participate early in the season to target the more abundant hatchery steelhead. Later in the season (February to May) the majority of fish entering the river are wild steelhead. Depending on abundance, the fishery may be modified to fewer days open per week and include gear restrictions to direct harvest at sturgeon (Quinault Indian Nation 2015:7).

The spring and summer management period is from April to July and directed at sturgeon foraging in Grays Harbor (Quinault Indian Nation 2015:3). This fishery is also less intense than the fall fishery. The spring and summer fishery may include catch of spring or summer Chinook salmon returning to the Chehalis River. However, the abundance of this run of Chinook has been low. Generally, not enough fish are returning to the river to provide for a directed fishery. The spring and summer sturgeon fishery is typically open 5 days per week with gear restrictions on size of gillnet mesh to reduce the incidental catch of Chinook. Quinault fisheries are generally closed August to mid-September to protect federal Endangered Species Act-listed green sturgeon.

Gillnet fishing schedules vary from year to year depending on abundance of different salmon species entering Grays Harbor, their run timing, and number of fish available for harvest (Quinault Indian Nation 2015:4). The Quinault Indian Nation (2015:4-5) provided the planned fall fishery schedule and predicted weekly catch in 2014 and 2015. The gillnet fishery starts mid-September in 2014 and late September in 2015. In both years, the scheduled days open per week varied from zero to 4 days from mid-September to early November. The 2015 planned schedule includes 3 weeks with no fishing (October 18 to November 7) in areas 2A and 2D (Figure 3.12-1; Chehalis River side of Gray Harbor) to reduce harvest on low-abundance wild chum salmon. The 2014 and 2015 fishery schedules are open 5 days per week from mid-November to the end of the year.

To provide a picture of timing of Chinook, coho, and chum catch in the fishery, the Quinault Nation have provided estimates of weekly catch based on a hypothetical 1-day per week fishery.

- **Fall fishery.** The largest predicted catch of Chinook salmon is from mid-September to the end of September. Chinook catch by week in early September and in October is predicted to be about half the late September weekly catch. Peak weekly catch of coho is from late September to late October. Coho catch in early to mid-September is predicted be much less. Coho catch declines rapidly from early November to the end of the fall management period. Peak weekly catch of chum salmon is over a shorter period and later than Chinook and coho. Predicted chum catch by week is highest from late October to mid-November.

  Scheduled openings in 2014 and 2015 during the peak Chinook catch period (mid- to late September) were 2 to 4 days per week (Quinault Indian Nation 2015:6-7). Scheduled openings in 2014 and 2015 during the peak coho catch period (late September to late of October) were 3 to 4 days per week early in the period. The 2015 fishery is scheduled to be closed the last 2 weeks of October. Scheduled openings in 2014 during the peak chum catch period (late October to mid-November) were 1 to 2 days per week. The fishery is scheduled to be closed through most of the peak chum period in 2015.

- **Winter fishery.** The 2013–2014 winter fishery scheduled was 5 days per week from mid-November to mid-April (Quinault Indian Nation 2015:8). Predicted catch in most weeks was less than 100 fish. Predicted weekly catch from early January to early February varied from 200 fish to more than 450 fish.

- **Summer fishery.** The 2015 scheduled spring and summer fishery is 5 days per week from mid-April to the end of July (Quinault Indian Nation 2015:9). The Quinault did not provide predicted weekly catch for this fishery.

Resource Dimensions (2015:68) summarized the number of fishers reported by the Quinault that participate in the various treaty-right fisheries. The Quinault provided additional information on the number of active fishers in the Grays Harbor gillnet fisheries and number of fishers by area. Resource Dimensions (2015:68) reported 123 fishers in the Grays Harbor gillnet fishery. The Quinault (2015:4) reported 70 authorized Quinault gillnet fishers in Grays Harbor. The Quinault limit the number of fishers in the Chehalis River portion of Grays Harbor, fishing areas 2D, 2A, 2A1, and the lower Chehalis River up to Wynoochee River, to 50 fishers (Figure 3.12-1). Another 10 fishers are authorized to fish in the Humptulips River and another 10 authorized to fish in the North Bay area (fishing area 2C).

Drift gillnet fishing effort in Grays Harbor during the fall management period is concentrated in certain locations based on relative abundance of fish (Goodell 2015a and Quinault Indian Nation 2015:10). Of the 50 fishers authorized for the Chehalis River portion of Grays Harbor, up to 25 fishers may operate drift gillnets in preferred areas of the Chehalis River and Grays Harbor from Cosmopolis to the Crossover Channel Reach of the navigation channel (Figure 3.12-1). Another group of fishers may deploy nets in the south channel near Markham. Fishers authorized to fish area 2C may deploy nets in North Bay off the mouth of the Humptulips River. Fishers authorized to fish the Humptulips River fish in the river and immediately off the mouth of the river.

Drift gillnet fishing is done during incoming and outgoing tides and during slack tide (Quinault Indian Nation 2015:11); Quinault fishers prefer the approximately 1-hour slack tide. The time that nets are in the water varies depending on fish abundance, and tidal and river currents. As a frame of reference, nontreaty commercial regulations for Grays Harbor limit soak times (the time that the net

first enters water to the time when the net is completely removed) to less than 45 minutes (Washington Department of Fish and Wildlife 2014). Quinault (2015:11) reports that nets may be deployed for up to 2 hours during slack tide. Quinault fishers take turns fishing desired areas. Fishers deploy gear one boat at a time, releasing their net beginning from the bank and extending across and in some cases into the navigation channel (Quinault Indian Nation 2015:10). The boat and net then drift with the current. During peak periods of the fall fishery, up to nine boats may be actively fishing the navigation channel near and in front of the terminals. At times of high abundance, there may be two to four fishers with their nets deployed drifting the channel at any one time. Each boat is spaced evenly in the navigation channel to share opportunities and maximize harvest. At the end of a drift, the fisher retrieves the net, removing fish at the same time. The Quinault (2015:11) report that the time required to retrieve a net is from 5 minutes at the quickest to 2 hours if the net is loaded with fish. Retrieval may take twice as long if the fisher is retrieving the net by hand. Boats that recently completed a drift may return to the start where they wait for their next turn at fishing or they may offload catch. There may be several boats returning to the start or waiting their turn to fish at any one time. Fishers may make two to six trips to offload catch in a 24-hour period at the peak of the run (Quinault Indian Nation 2015:12). Fishing nets are marked at each end by orange or red marker buoys during daylight hours. When fishing occurs at night, nets are marked at each end with a steady white or flashing white or red light.

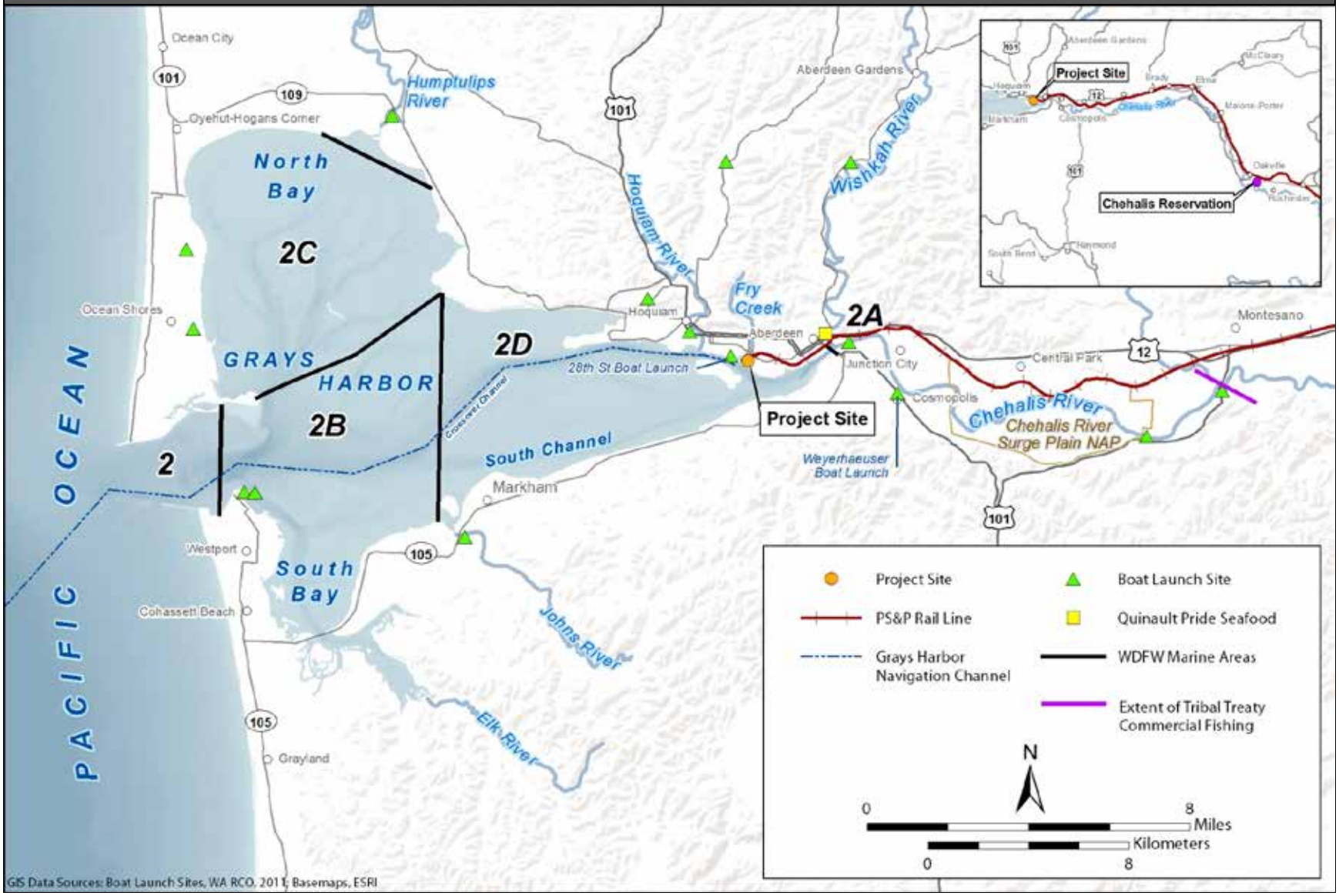
Fishers may choose to fish for salmon, steelhead, and white sturgeon using set nets attached to the bank. The relative number of drift and set nets deployed for salmon, steelhead, and sturgeon in Grays Harbor is not reported. Quinault fishing regulations restrict the use of set nets for white sturgeon downstream of the US Route 101 (US 101) bridge (Scharpf pers. comm. May 26 2015). Annual landed catch for 2004 to 2013 for Grays Harbor treaty gillnet fisheries (all areas and gear types combined) is summarized in Table 3.12-2. Fall fisheries for coho, chum, and Chinook harvested an average of 31,340 fish. Chinook catch are not reported separately for fall and spring Chinook. Thus, fall catch is an overestimate as some spring Chinook are included in the total. However, the spring and summer Chinook catch is relatively small compared to the fall Chinook catch (Quinault Indian Nation 2015:8). Coho made up the largest portion of the fall harvest (averaging 20,387 fish). The winter fishery catch of steelhead is much smaller, averaging 3,129 fish. Quinault fishers harvested an average of 1,758 sturgeon.

Table 3.12-2. Quinault Grays Harbor Salmon, Steelhead, and White Sturgeon Fisheries, Annual Catch

Year	Chinook Catch (# fish)	Coho Catch (# fish)	Chum Catch (# fish)	Winter Steelhead Catch (# fish)	White Sturgeon Catch (# fish)
2004	3,546	18,093	9,600	6,742	1,544
2005	2,297	23,428	5,804	4,992	3,374
2006	3,758	8,746	4,070	3,404	2,918
2007	2,483	8,927	598	3,975	1,766
2008	1,880	10,208	2,070	1,467	3,206
2009	2,512	28,487	4,397	697	1,373
2010	3,403	25,347	8,938	1,837	1,125
2011	6,417	27,982	17,207	3,341	947
2012	3,994	30,693	11,670	2,880	598
2013	2,909	21,692	11,976	1,955	726
Average	**3,320**	**20,387**	**7,633**	**3,129**	**1,758**

Source: Resource Dimensions 2015: 61-62

Figure 3.12-1. Tribal Fishing Resources



Chinook and Coho Salmon—Ocean Troll Fishery

The treaty ocean-troll fishery typically begins May 1 and extends to September 15 (Quinault Indian Nation 2015:14). Troll vessels drag baited hooks or lures at the depth of the target species. Chinook salmon are harvested from May 1 to June 30 or when allowable catch has been attained. The fishery remains open from July 1 to mid-September for coho salmon and Chinook if allowable catch has not been attained. The Chinook and coho ocean fisheries may close early if allowable catch has been attained early.

Areas fished by Quinault fishers are coastal waters from Destruction Island just north of the Quinault Reservation boundary to Grays Harbor (50 CFR 660.50). Quinault fishers access the fishery from Grays Harbor.

Table 3.12-3 summarizes the annual Quinault fisher participation and catch for Chinook and coho in the ocean troll fishery. Across the decade, catch was generally evenly split between Chinook and coho, but varied significantly for each year. Chinook are the more valuable fish because of the higher price per pound for Chinook and their larger size (Resource Dimensions 2015: 63–64).

Table 3.12-3. Quinault Treaty Ocean Troll Fishery, Annual Catch

Year	Quinault Fishers (number of fishers)	Chinook Catch (number of fish)	Coho Catch (number of fish)
2004	1	237	170
2005	0	3,113	578
2006	6	200	165
2007	4	367	1,039
2008	5	437	591
2009	3	432	4,039
2010	16	2,519	1,988
2011	6	1,944	719
2012	5	1,456	1,080
2013	4	616	997
Average	**5**	**1,132**	**1,137**

Source: Resource Dimensions 2015:64-69

The Quinault do not maintain records of subsistence or ceremonial catch from the troll fishery, which is estimated to range from 5 to 20% of reported commercial catch based on interviews with fishers (Resource Dimensions 2015:78).

Dungeness Crab

Quinault fishers operate crab-fishing vessels in Grays Harbor and coastal waters outside of Grays Harbor (Goodell 2015a, 2015b). Although regulations for the Quinault Dungeness crab fishery allow subsistence and commercial harvest from November through September (Quinault Indian Nation 2014a), the majority of the catch occurs between November and February (Quinault Indian Nation 2015:13)—months that are prone to extreme weather events. The ocean vessels use the navigation channel to transport the catch into the harbor; to lessen the danger of hazardous conditions during incoming or outgoing tides, bar crossings are often timed during slack high or low tides. The treaty commercial crab season generally opens 45 days prior to the nontreaty commercial fishery to help

ensure equal catch allocation with nontreaty fishers. Early in the season, prior to the nontreaty fishery opening, Quinault fishers deploy pots along the coast close to Grays Harbor. Quinault fishers have an exclusive fishing area north of Grays Harbor (mouth of Copalis River to mouth of Raft River) within the Quinault usual and accustomed area when the nontreaty fishery is open. This exclusive Quinault area also ensures an equal sharing of the catch with nontreaty fishers. The Quinault have had to implement gear restrictions later in the season to limit treaty harvest for equal sharing with nontreaty fishers.

Table 3.12-4 summarizes the annual Quinault participation and catch in the Dungeness crab fishery (2004 to 2013). Quinault fishers harvest an average of 2.6 million pounds of crab annually, of which an estimated 23,529 pounds are harvested for subsistence (Resource Dimensions 2015:80).

Table 3.12-4. Quinault Dungeness Crab Fishery, Annual Commercial Catch

Year	Quinault Fishers (number of vessels)	Catch (pounds)
2004	15	1,486,853
2005	26	3,188,806
2006	21	1,371,961
2007	22	2,956,441
2008	25	2,061,477
2009	24	3,004,009
2010	21	2,771,881
2011	21	3,254,288
2012	21	2,019,549
2013	21	3,694,925
Average	**21.7**	**2,581,019**

Source: Resource Dimensions 2015: 64-69

Marine Fisheries—Halibut, Sablefish, Lingcod, Rockfish, and Sardine

Quinault fishers operate long-line ocean fishing vessels in coastal waters outside of Grays Harbor for halibut, sablefish, and other marine species (Goodell 2015b).

Quinault fishers harvest a portion of the treaty allocation for halibut shared among the Quinault, Hoh, Makah, and Northern Puget Sound treaty tribes. The fishery opens in March with a 48-hour opening followed by additional openings with restrictions on number of pounds harvested by vessel per day. The fishery remains open until the treaty allocation has been harvested, usually by May (Quinault Indian Nation 2015:14).

Quinault fishers harvest a portion of the treaty allocation for sablefish shared among the Quinault, Hoh, and Makah Tribes (Quinault Indian Nation 2015:14). The fishery opens in March with a concurrent opening for the four tribes. Additional openings occur through the summer and fall on individual tribal quotas of the treaty allocation. Effort and catch decline as the season progresses and the quota for the Quinault Indian Nation is attained.

Table 3.12-5 summarizes the annual Quinault participation and catch in the marine fisheries (2004 to 2013). Quinault fishers harvest an average of 737,800 pounds marine fish annually.

Table 3.12-5. Quinault Marine Fisheries, Annual Commercial Catch

Year	Quinault Fishers (number of vessels)	Catch, All Species (pounds)
2004	13	437,512
2005	12	351,014
2006	12	406,641
2007	10	264,308
2008	15	346,625
2009	16	424,084
2010	13	300,456
2011	13	260,040
2012	12	3,127,701
2013	9	1,459,616
Average	**12.5**	**737,800**

Source: Resource Dimensions 2015: 64-69

Confederated Tribes of the Chehalis Reservation

The Chehalis own tidal land in Grays Harbor (County parcel 181226849800) and use it for recreational shellfish harvesting. The tribe plans to make it a commercial operation in the future (Connelly pers. comm.). Chehalis tribal members do not have fishing rights in Grays Harbor or marine waters.

3.12.5 What are the potential impacts on tribal resources?

This section describes impacts on tribal resources that could occur in the study area. Potential impacts of the no-action alternative are described first, followed by potential impacts of the proposed action.

3.12.5.1 No-Action Alternative

Under the no-action alternative, the applicant would continue to operate its existing facility as described in Chapter 2, Section 2.1.2.2, *Existing Operations*. Large commercial vessel[3] traffic in Grays Harbor and Terminal 1 berth occupancy would increase slightly under the no-action alternative compared to existing conditions (Section 3.17, *Vessel Traffic*). Impacts related to restricted and interrupted access to the tribal fishery in Grays Harbor would be similar to existing conditions. Although the proposed action would not occur, it is assumed that growth in the region would continue under the no-action alternative, which could lead to development of another industrial use at the project site within the 20-year analysis period (2017 to 2037). Such development could result in impacts similar to those described for the proposed action.

3.12.5.2 Proposed Action

This section describes impacts that could occur in the study area as a result of construction and routine operation of the proposed action. First, this section describes impacts from construction of

[3] The term *large commercial vessel* refers collectively to tank and cargo vessels.

the proposed action. It then describes impacts of routine operation at the project site and of routine rail and vessel transport to and from the project site.

Construction

Construction of the proposed action could have an impact on tribal resources if construction activities were to limit access to or degrade the resources used by the tribes, including the plants and fisheries described in Section 3.12.4.3, *PS&P Rail Line* and Section 3.12.4.4, *Grays Harbor*. Because all work would be limited to the project site and no in-water work would occur, construction would not restrict access to tribal resources in the study area.

Construction of the proposed action at the project site could degrade the fishery if construction activities were to impair water quality as a result of increased erosion of soils into Grays Harbor or produce vibration levels from pile driving that would be harmful to fish in Grays Harbor. As described in Section 3.1, *Earth*, the potential for increased erosion on the project site is low, because the site is relatively flat and contains soils that have low erosion potential. As described in Section 3.3, *Water*, Section 3.4, *Plants*, and Section 3.5, *Animals*, the construction activities would be subject to water pollution control laws and are not expected to result in any permanent impacts on water resources, or related impacts on plants, animals, or fish. As described in Section 3.5, *Animals*, noise levels in the waters adjacent to the project site from pile driving at the project site do have the potential to exceed levels deemed to be potentially harmful to fish. Implementation of the mitigation in Section 3.5.7.2, *Applicant Mitigation*, would address this impact. Therefore, construction of the proposed action would have no impact on tribal resources.

Operations

This section describes impacts that would occur as a result of routine operations at the project site, rail transport along the PS&P rail line, and vessel transport through Grays Harbor.

Onsite

Onsite operations of the proposed action could have an impact on tribal resources if operations were to limit access to or degrade the resources used by the tribes, including the plants and fisheries described in Section 3.12.4.3, *PS&P Rail Line*, and Section 3.12.4.4, *Grays Harbor*.

Onsite operations could degrade plants and fisheries as a result of ongoing impacts on water quality resulting from increased stormwater runoff. However, as described in Section 3.3, *Water*, facility operations would be subject to water pollution control laws and the potential for impacts on water quality during routine operations would be slightly greater than under the no-action alternative. The impacts would not be at a level to affect the health of the Grays Harbor's plants or animals, as discussed further in Section 3.4, *Plants* and Section 3.5, *Animals*. The potential impacts associated with oil spills are addressed in Chapter 4, *Environmental Health and Safety*.

Onsite operations could reduce access to tribal fishing areas as result of the increased frequency of vessels docked at the Terminal 1 berth. As noted above, tribal fishers deploy gillnets and drift with the tide, taking turns sweeping through segments of the harbor that typically extend as far as Cosmopolis to the Crossover Channel Reach of the navigation channel. This area includes the portion of the navigation channel in front of the Terminal 1 berth. Depending on its size, a docked vessel

would occupy approximately 20 to 25% of the width of the channel.[4] While a vessel is at berth, fishing nets cannot be extended as far and cannot access the areas nearest to the dock structure where fish are assumed to be concentrated (Quinault Indian Nation 2015: Exhibit E) (Figure 3.12-1). When a vessel is docked, fishers must either shorten the duration of their drift to stop as they near the vessel or move farther out into the navigation channel to avoid the vessel. Lighting impacts from nighttime transfer operations may also affect fishing operations by affecting fish behavior.

Vessel calls under the proposed action would occupy the Terminal 1 berth up to 200 days per year.[5] When combined with occupancy by baseline vessels, the Terminal 1 berth would be occupied approximately 244 days per year (Section 3.17, *Vessel Traffic*). Under the no-action alternative, the berth would be occupied approximately 58 days per year.

The most intensive fishing at the dock area is during the fall salmon management period from September to mid-November, when several fishing vessels may deploy drift gillnets near the Terminal 1 berth. Quinault fishers may also fish the area during other times of the year, deploying gillnets for winter steelhead and white sturgeon in spring and summer.

On average, vessels related to the proposed action would occupy the berth approximately 4 days per week compared to an average of 1 day per week under the no-action alternative. During periods of maximum catch for Chinook, coho, or chum salmon, the fall fishery is typically open 2 to 4 days per week and sometimes up to 5 days per week. Assuming a 24-hour maximum berth occupancy and vessel calls evenly dispersed over the week, it is likely a vessel would be at the dock during a portion of the open treaty fishery. However, the potential of these vessels to affect treaty catch is dependent on how fish are distributed across the navigation channel relative to the remaining channel area available to treaty fishers.

Salmon concentrate next to the dock at Terminal 4 (Quinault Indian Nation 2015: Exhibit E); however, the navigation channel is narrower at Terminal 1 and salmon may be distributed differently at this location compared to the wider channel and adjacent shallow areas leading to the south channel at Terminal 4. Migration patterns in estuaries and rivers are complex. Hinch and Rand (2000) found evidence to suggest sockeye salmon were efficient at finding small reverse flow vortices to increase swimming efficiencies during upstream migration. Generally upstream migrating salmon avoid fast water by swimming near the shore and near the bottom (Quinn 2005:80). Large Chinook salmon tend to migrate upstream further from the bank than smaller salmon (i.e., sockeye). Hughes (2004) hypothesized that Chinook salmon migrate further from the bank to avoid wave drag caused by swimming close to the surface in shallow water. However, all species may distribute similarly in the dredged and tidally influenced navigation channel.

Depending on the specific circumstances of each interaction (e.g., chance of a vessel calling during an open fishing window, distribution of the fish, number of fishers on any given day), it is difficult to predict whether increased occupancy at Terminal 1 would significantly affect the tribe's ability to meet the treaty allocation under their current practices. If a vessel is at berth during the fall fishery, Quinault fishers have the option to fish longer (complete more drifts) or may choose to fish other preferred locations in Grays Harbor (such as other portions of the navigation channel, farther away

[4] The typical 550-class tank barge is approximately 600 feet in length and a maximum of 78 feet wide and is assisted by a tug that is approximately 127 feet long and a maximum of 42 feet wide. A Panamax-class tanker has a maximum overall length of 950 feet and a maximum width of approximately 106 feet.

[5] Assumes all vessels are tank barges with a maximum 24-hour berth occupancy.

from the shoreline or father upstream). However, opportunities to relocate during intense fishing periods may be limited if the other areas are occupied by fishers. Implementation of the mitigation described in Section 3.12.7.2, *Applicant Mitigation,* would reduce the potential impacts on treaty tribal fishing.

Docked vessels at other times of the year likely would have less of an impact because fewer fishers are out and would have more options to move to other preferred areas in Grays Harbor and the Chehalis River.

Rail

Operation of the proposed action at maximum throughput would add approximately two unit train trips[6] per day on average (730 per year maximum) along the PS&P rail line to the average three train trips per day (1,235 per year) under the no-action alternative (Section 3.15, *Rail Traffic*). This increase in rail traffic could have an impact on tribal resources if it were to reduce access to tribal fishing fleets, boat launches, and gillnet set net sites as a result of vehicle delay at PS&P rail line crossings or if it were to degrade the fishery through water quality impacts.

The only rail crossing between the Quinault Indian Reservation and its fleet in the Westport Marina is at the US 101 bridge over the lower Chehalis River, which is not an at-grade crossing. There is no rail crossing between the Quinault Indian Reservation and the Quinault Pride Seafood dock in Aberdeen.

Access to Quinault fishing sites on the north side of the Chehalis River around Cosmopolis would be affected by increased rail traffic at the Junction City Road grade crossing and other smaller grade crossings between Cosmopolis and the Wynoochee River. However, as noted in Section 3.16, *Vehicle Traffic and Safety*, increased rail traffic on the PS&P rail line between Centralia and Aberdeen is not anticipated to result in substantial increases in delay at grade crossings. Quinault fishers accessing fishing sites from the south side of the Chehalis River (Cosmopolis and US 101) would not be affected by increased rail traffic. As discussed in Section 3.17, *Vessel Traffic*, access to boat ramps in Grays Harbor would not be affected by the proposed action. The 28th Street Boat Ramp in Hoquiam used by Quinault fishers to launch boats and offload catch would not be affected by increased rail traffic as the access road crosses the PS&P rail line west of the project site.

Access to fishing sites by the Chehalis Tribe would not be affected by the increase in rail traffic because access roads to fishing sites do not cross the PS&P rail line.

As described in Sections 3.3, *Water*, 3.4, *Plants*, and 3.5, *Animals*, leaks and spills of petrochemicals from routine rail operations and associated maintenance could increase under the proposed action because of increased rail trips. The increase would be slightly greater than under the no-action alternative and is not expected to have any measurable impact on water quality, aquatic habitat, or animals.

[6] A trip represents one-way travel; in other words, an inbound trip and an outbound trip are counted as two trips.

Vessel

Operation of the proposed action at maximum throughput would result in a maximum 400[7] tank vessel trips[8] per year through Grays Harbor, compared to 436 large commercial vessel trips per year projected under the no-action alternative. This increase in vessel trips related to the proposed action could have an impact on tribal resources if it were to degrade water quality or reduce access to tribal resources, including the plants and fisheries described in Section 3.12.4.3, *PS&P Rail Line* and Section 3.12.4.4, *Grays Harbor*.

As described in Sections 3.3, *Water*, 3.4, *Plants*, and 3.5, *Animals*, small spills or leaks of petrochemicals from routine vessel operations and associated maintenance could increase under the proposed action because of increased vessel trips. Spill prevention and contingency planning is discussed in Chapter 4, *Environmental Health and Safety*. However, the potential for these accidents to occur would be reduced by appropriate training and the implementation of prevention and control measures as described in the facility spill prevention, control, and countermeasures plan, vessel spill response plan and facility oil spill prevention plan. For these reasons, impacts related to spills and leaks from routine operations present a low risk to aquatic habitat and animals likely to be present along the shoreline near the project site.

Because vessel traffic under the proposed action would be limited to the navigation channel (Section 3.17, *Vessel Traffic*), impacts on tribal resources in the harbor but outside the channel are not expected. Drift and set-net gillnet fishers operating east of Terminal 1 and the turning basin, in the south channel near Markham, and in Area 2C would not be affected by the increase in vessel traffic under the proposed action. Crab fishing grounds in Grays Harbor are outside of the navigation channel and access to those areas would not be affected by the increase in vessel traffic. This increased vessel traffic would have no impact on the Chehalis, because their protected tribal fishing is within the Chehalis Reservation.

Vessels related to the proposed action would be most likely to affect tribal fishing during the fall salmon management period, when more fishers typically deploy drift gillnets in the navigation channel (from the Crossover Channel Reach of the navigation channel to the turning basin). This is the area with the greatest potential for conflict between tribal fishers and vessels related to the proposed action. During peak periods of the fall fishery, up to nine boats may be actively fishing this area and two to four fishers with nets deployed at one time (Quinault Indian Nation 2015:10). Increased vessel traffic related to the proposed action means that there would be a greater chance that a vessel could travel through this area and affect tribal fishing. Vessels related to the proposed action would transit this portion of the navigation channel eight times per week on average; for comparison, large commercial vessels would transit this portion of the channel approximately eight times per week on average under the no-action alternative.

As described in Section 3.17, *Vessel Traffic*, it takes approximately 2 hours for vessels to transit the navigation channel between the entrance buoy and Terminal 1. Favorable transit times for vessels related to the proposed action are close to high tide. Quinault fishers currently choose the high slack tide period for salmon drift gillnetting. Assuming the vessel is between the Crossover Channel Reach

[7] Proposed vessel trips are total for the facility so are not in addition to trips attributable to the applicant under the no-action alternative (approximately 14 per year).
[8] A trip represents one-way travel.

of the navigation channel and Terminal 1 for approximately half of the 2-hour transit time, including docking and undocking maneuvers, a vessel trip could disrupt fishing for a 1-hour period.

Transiting vessels related to the proposed action would affect (limit) the timing, duration, and physical area that could be fished. Depending on the specific circumstances of the interaction, this could affect the volume of a day's catch. Fishers may be able to compensate for lost fishing time by retrieving their net and motoring back to the start of the drift area; however, depending on factors such as the time of day and number of other fishers, it may not be practical to do so and the disruption could equate to lost fishing opportunities.

As noted in Section 3.12.7.2, *Applicant Mitigation*, providing advance notice of incoming vessels related to the proposed action could help reduce potential conflicts. Although it is difficult to predict whether the increased vessel traffic would result in an overall inability to meet the tribe's seasonal quota, increased traffic would limit access to usual and accustomed fishing areas. Implementation of the mitigation described in Section 3.12.7.2, *Applicant Mitigation*, would help address this impact.

Increased vessel transit under the proposed action could also reduce access to the Quinault's ocean crab and marine fisheries by limiting access by tribal fishers to cross the bar leaving the mouth of Grays Harbor. As stated, although loaded tank vessels would be restricted to transit during high tide, inbound vessels in ballast could transit the navigation channel at any time. Inbound and outbound vessels could disrupt access to the Quinault's ocean crab and marine fisheries because ocean fishing vessels prefer to use the navigation channel to transport the catch into the harbor. To lessen the danger of hazardous conditions during incoming or outgoing tides, bar crossings are often timed during slack high or low tides. It is likely this disruption would be minor because smaller Quinault fishing vessels would have the ability to skirt around or adjust their time to avoid the transiting tank vessels.

Quinault fishers participating in the Dungeness crab fishery inside Grays Harbor would not be affected by tank vessels related to the proposed action because they operate outside the navigation channel and monitor marine communications to avoid larger vessels when transiting to fishing grounds.

3.12.6 What required permits and plans apply to tribal resources?

No required permits or plans apply to tribal resources.

3.12.7 What mitigation measures would reduce impacts on tribal resources?

This section describes the applicant mitigation that would reduce impacts on tribal resources from construction and routine operation of the proposed action.

3.12.7.1 Applicant Mitigation

The applicant will implement the following mitigation.

- To mitigate potential impacts on tribal fishing, the applicant will coordinate with the Quinault Indian Nation and Washington Department of Fish and Wildlife, as requested, to support review and possible adjustments of docking schedules to minimize conflict with fishing schedules

negotiated preseason by the state and tribe. Consultation will account for operations, including anticipated vessel movements related to the proposed action.

- While tribal fishing boats are required to follow the U.S. Coast Guard navigation rules, to improve awareness of vessel traffic in the navigation channel, the applicant will work with the Grays Harbor Safety Committee, including the US Coast Guard and Port of Grays Harbor, to establish procedures to announce project related vessel traffic arrivals and departures over a designated very high frequency (VHF) marine radio channel.
- To mitigate impacts on access to tribal treaty fishing areas, the applicant will initiate a process between stakeholders and Quinault Indian Nation tribal officials to discuss and identify additional mitigation measures such as, limiting vessel calls during peak fishing seasons. Initiation of the process between the parties will occur before vessel operations begin.

3.12.8 Would the proposed action have unavoidable and significant adverse impacts on tribal resources?

Implementation of the mitigation measures described above would reduce but may not completely eliminate impacts on tribal resources. More specifically, vessels related to the proposed action would travel through usual and accustomed fishing areas in Grays Harbor. Under current and future conditions, increased vessel traffic could restrict access to tribal fishing areas in the navigation channel and adjacent to Terminal 1. This conflict is most likely to occur for fishing related to harvest of salmon, steelhead, and sturgeon. Because other factors besides vessel operations affect fishing opportunities, such as the number of fishers, fish distribution, timing, and duration of fish windows, the extent to which vessel operations related to the proposed action would affect tribal fishing is difficult to quantify. No mitigation measures would completely eliminate the possibility of impacts to fishing resources because of vessel operations related to the proposed action.

3.13 Public Services and Utilities

Public services and utilities refer to water, wastewater treatment, and solid waste disposal services that are provided to communities. These services contribute to the health and well-being of citizens and communities. The construction and operation of the proposed action could place additional demands on or otherwise affect public services and utilities. Utilities also include electricity and natural gas services; these utilities are addressed in Section 3.6, *Energy and Natural Resources*. Public services also include emergency response and medical services; these services are addressed in Chapter 4, *Environmental Health and Safety*.

This section describes water supplies, wastewater collection and disposal, and solid waste disposal services in the study area. It then describes impacts on these services that could result under the no-action alternative or as a result of the construction and routine operation[1] of the proposed action. Finally, this section presents any measures identified to mitigate impacts of the proposed action and any remaining unavoidable and significant adverse impacts.

3.13.1 What is the study area for public services and utilities?

The study area for public services and utilities consists of the service areas that encompass the project site that could be affected by construction and routine operation at the project site. Because transport along the Puget Sound & Pacific Railroad (PS&P)[2] and in Grays Harbor would occur within existing transportation corridors, the proposed action would not require the provision of additional public services or utilities (e.g., provision of water, wastewater treatment, and solid waste disposal services) to accommodate the increased traffic associated with routine operations. Therefore, these areas are not addressed in this section.

3.13.2 What laws and regulations apply to public services and utilities?

Laws and regulations for determining potential impacts on public services and utilities are summarized in Table 3.13-1. More information about the applicable laws and regulations is provided in Appendix B, *Laws and Regulations*.

[1] Chapter 4, *Environmental Health and Safety*, addresses the potential impacts from increased risk of accidents (e.g., storage tank failure, train derailments, vessel collisions) and related consequences (e.g., release of crude oil or other proposed bulk liquids).

[2] The PS&P rail line refers to the rail line between Centralia and the project site.

Table 3.13-1. Laws and Regulations for Public Services and Utilities

Laws and Regulations	Description
Federal	
No federal laws or regulations apply to public services and utilities.	
State	
Building Permit Application – Evidence of Adequate Water Supply (RCW 19.27.097)	Requires applicant to provide evidence of adequate water supply for the intended use of the building.
Prohibited Methods of Sewage Disposal (RCW 43.20.050)	Prohibits disposal of sewage and industrial waste in a manner that would negatively affect domestic water supply or endanger the health and well-being of the people of the state.
Local	
Adoption of International Fire Code (HMC 2.38 and AMC 15.12)	Recognizes that the respective city has adopted the International Fire Code, 2012 Edition, as the official fire code of the city.
Solid Waste and Recyclable Materials (HMC 3.16.030 and AMC 13.08)	Regulates safe, reliable, and responsible use of public services by establishing a system for collection, removal, and disposal of solid waste and recyclables and indicating other forms of disposal is unlawful.
Water System Regulations (AMC 13.56)	Set of requirements and specifications for use of City of Aberdeen water supply with regards to connections and maintenance of pipelines, provisions to avoid insufficient supply for fire flow, permitting, emergency water use restrictions, and fire protection services.

RCW = Revised Code of Washington; HMC = Hoquiam Municipal Code; AMC = Aberdeen Municipal Code

3.13.3 How were impacts on public services and utilities evaluated?

This section describes the sources of information and methods used to evaluate impacts.

3.13.3.1 Information Sources

Information about public services and utilities in the study area was obtained by interviewing local service providers and reviewing public scoping comments, previous environmental documents related to the proposed action, project construction and operation plans, and local plans.

3.13.3.2 Impact Analysis

The impact analysis considers the proposed action's potential to affect utilities that provide potable (drinkable) and industrial water, collect and treat wastewater, and dispose of solid waste during construction, as well as subsequent routine operations. Impacts were evaluated in the context of applicable regulatory requirements (Section 3.13.2) and the current capacity of these public services and utilities.

3.13.4 What public services and utilities are in the study area?

This section describes public services and utilities in the study area that could be affected by construction of the proposed action and routine operations at the project site.

3.13.4.1 Water Supplies

The City of Aberdeen Public Works Department is responsible for providing municipal services related to water supply distribution to the project site. Under existing operations, the department provides potable and industrial water to the project site. The department's potable water capacity is 6.5 million gallons per day and current demand averages 2.6 million gallons per day (Randich pers. comm.[a]). The industrial water supply capacity is 100 million gallons per day, of which current demand only accounts for a small fraction (Randich pers. comm. [b]).

3.13.4.2 Wastewater Collection and Treatment

The City of Aberdeen Public Works Department provides treatment of wastewater at the project site. The department's current collection system consists of 16 lift stations that are fed by 82 miles of sanitary sewer. The treatment facility is located in Aberdeen and discharges treated wastewater into the Chehalis River.

More than $1.1 million in capital improvements were made to the City's wastewater treatment facility in 1999 and 2000, and $7.6 million of capital projects are currently under construction (City of Aberdeen 2014). The current use and available capacity of the facility are shown in Table 3.13-2.

Table 3.13-2. Current Use and Available Capacity for the City of Aberdeen Wastewater Treatment Facility

Permit Defined Design Criteria	2013 Peak or Maximum	Annual Average	Maximum Available Capacity	Maximum Available Capacity (%)
Average flow for the maximum month: 9.90 mgd	January: 4.30 mgd	3.25 mgd	5.6 mgd	43
Peak hourly flow: 18.0 mgd	15.5 mgd	N/A	2.5 mgd	14
BOD_5 loading for maximum month: 7,400 lbs/day	April: 4,910 lbs/day	4,342 lbs/day	2,490 lbs/day	34
TSS loading for maximum month: 8,900 lbs/day	September: 8,629 lbs/day	8,629	271 lbs/day	3

Source: Scott pers. comm.
mgd = million gallons per day; N/A = not applicable; BOD_5 = 5-day biological oxygen demand; lbs/day = pounds per day; TSS = total suspended solids

3.13.4.3 Solid Waste Disposal

Solid waste collection and disposal services in the study area are provided by Hometown Sanitation LLC and LeMay, Inc. Both companies provide garbage and recycling collection for residential and commercial customers. Under existing conditions, Hometown Sanitation provides collection service to the project site. Solid waste collected by Hometown Sanitation is transported to LeMay's Central Transfer Station, in Aberdeen, for temporary storage prior to transport for permanent disposal. The transfer station is currently at about 60% capacity, but has a flexible system to respond to shifts in

demand (Dionne pers. comm.). Waste from the transfer station is trucked to the Wasco County Landfill in The Dalles, Oregon, for permanent disposal (Stalander pers. comm.).

Hazardous waste collection and disposal is provided to the study area by several companies. Currently, the applicant contracts with Emerald Services, Inc., Waste Management, Cowlitz Clean Sweep, and PRS Group, Inc., as needed.

3.13.5 What are the potential impacts on public services and utilities?

This section describes impacts on public services and utilities that could occur in the study area. Potential impacts of the no-action alternative are described first, followed by potential impacts of the proposed action.

3.13.5.1 No-Action Alternative

Under the no-action alternative, the applicant would continue to operate its existing facility as described in Chapter 2, Section 2.1.2.2, *Existing Operations*. Although the proposed action would not occur, it is assumed that growth in the region would continue under the no-action alternative, which could lead to development of another industrial use at the project site within the 20-year analysis period (2017 to 2037). Such development could result in impacts similar to those described for the proposed action.

3.13.5.2 Proposed Action

This section describes impacts that could occur in the study area as a result of construction and routine operation of the proposed action. First, this section describes impacts from construction of the proposed action. It then describes impacts of routine operation at the project site.

Construction

Construction of the proposed action would temporarily increase the demand for water at the project site. Industrial water would be used for construction and for hydrostatic testing; 3.4 million gallons of water would be used to conduct serial hydrostatic testing of one storage tank at a time. Special treatment of the hydrotest water prior to discharge is not expected but if the water exceeds discharge requirements, the water would be treated appropriately (e.g., filtering, pH adjustment) on site prior to discharge or shipped for offsite disposal if it cannot be handled on site. If no contamination issues are found, a hose would be attached to a valve on the last tank and routed into the stormwater sump of the new tank farm containment for release into Grays Harbor through the Port of Grays Harbor stormwater system. Information about stormwater runoff and water quality is provided in Section 3.3, *Water*.

Potable and industrial water supply for construction would be provided by the City of Aberdeen and considered an additional demand to the applicant's existing facility account.

Construction activities would also result in a temporary increase in solid waste and hazardous waste, including debris from construction of new facilities. Most of the excess construction materials and construction debris would be repurposed on-site or sent to a local recycling facility. Reuse and recycling of these materials would reduce the amount of construction solid waste transferred to the landfill. It is anticipated that solid waste generated during construction would be taken to LeMay's

Central Transfer Station prior to transport for permanent disposal. The transfer station and destination landfill have adequate capacity to handle this temporary increase in waste. It is anticipated that the applicant would use one or more of the providers listed in Section 3.13.4.3, *Solid Waste Disposal*, for collection and disposal of these wastes. The handling of hazardous materials is addressed in Section 3.14, *Hazardous Materials.*

Operations

The proposed action would result in new buildings[3] and 20 to 30 additional employees, which would modestly increase the demand for potable water on site. This demand would be added on to the applicant's existing contract with the City of Aberdeen Public Works Department. As noted, the applicant would be required to comply with the code that protects the city's water supply.

Routine operation of the proposed action would also increase the amount of solid waste generated at the project site. Hometown Sanitation LLC would provide services for regular pickup; LeMay's Central Transfer Station would be available to handle excess solid waste. The incremental increase in solid waste would be within the capacity of both service providers and that of the destination landfill.

Operation of the proposed action could also generate hazardous waste as a result of minor releases, as described in Section 3.14, *Hazardous Materials*. These hazardous materials would require safe disposal and would be hauled separately from regular solid waste. It is anticipated that the applicant would continue to contract with the providers listed in Section 3.13.4.3, *Solid Waste Disposal*, to collect and dispose of these wastes. Information specific to the safe handling of hazardous materials in compliance with applicable regulations is discussed in Section 3.14, *Hazardous Materials*.

3.13.6 What required permits and plans apply to public services and utilities?

The following permit conditions and required plans are expected to reduce impacts on public services and utilities.

- City of Hoquiam and City of Aberdeen Fire Department Permits.
  - Permits the proposed action as meeting fire prevention and suppression requirements.
  - Adherence to the International Fire Code, 2012 Edition.
- City of Aberdeen Utility Services Agreement.
  - Communication and coordination.

3.13.7 What mitigation measures would reduce impacts on public services and utilities?

This section describes the applicant mitigation that would reduce potential impacts on public services and utilities.

[3] The new buildings would provide office space and support facilities.

3.13.7.1 Applicant Mitigation

With implementation of the permit conditions described above, impacts resulting from the proposed action are considered low and would not necessitate mitigation.

3.13.8 Would the proposed action have unavoidable and significant adverse impacts on public services and utilities?

Compliance with the applicable regulations and permits described above would reduce impacts on public services and utilities. There would be no unavoidable and significant adverse impacts.

3.14 Hazardous Materials

Hazardous materials are substances that could affect the safety of the human or natural environment. There are risks in using, storing, and transporting hazardous materials. If a hazardous material is released to the environment, it may contaminate the surrounding area and could expose people and the environment to harm.

This section describes hazardous materials in the study area, including past land uses and the associated risks of site contamination. In addition, this section describes the existing and proposed onsite operations with the potential to result in exposure to hazardous materials. It then describes impacts related to hazardous materials that could occur under the no-action alternative or as a result of the construction and routine operation of the proposed action. The analysis of impacts of the proposed action addresses the risks associated with smaller-scale releases of the proposed bulk liquids, including crude oil at the project site in general terms.[1] A detailed analysis of potential impacts from spills and incidents is included in Chapter 4, *Environmental Health and Safety*. Finally, this section presents any measures identified to mitigate impacts of the proposed action and any remaining unavoidable and significant adverse impacts.

3.14.1 What is the study area for hazardous materials?

The study area for hazardous materials includes all hazardous materials on and near the project site that could be affected by construction and routine operation at the project site. Potential hazardous materials impacts along the Puget Sound & Pacific Railroad (PS&P)[2] and in Grays Harbor and adjacent state waters off the coast are addressed in Chapter 4, *Environmental Health and Safety*.

3.14.2 What laws and regulations apply to hazardous materials?

Laws and regulations for determining potential impacts related to hazardous materials are summarized in Table 3.14-1. More information about these laws and regulations is provided in Appendix B, *Laws and Regulations*.

[1] Chapter 4, *Environmental Health and Safety*, addresses the potential risks associated with larger-scale releases related to onsite operations and rail and vessel transport.

[2] The PS&P rail line refers to the rail line between Centralia and the project site.

Table 3.14-1. Laws and Regulations for Hazardous Materials

Laws and Regulations	Description
Federal	
Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. 103)	Regulates proper site characterization of and site remediation for hazardous materials.
Resource Conservation and Recovery Act (42 U.S.C. 6901 et seq.)	Regulates hazardous waste through a regulatory framework that includes requirements for entities that generate, store, transport, treat, and dispose of hazardous waste (40 CFR 260 through 299).
Clean Water Act (33 U.S.C. 1251 et seq.)	Establishes the structure for regulating discharges of pollutants into navigable waters of the United States by regulating point pollution sources, such as stormwater discharges, and contains specific provisions related to the accidental release of oil and other hazardous substances into U.S. waters.
Oil Pollution Act of 1990 (33 U.S.C. 40)	Requires more stringent planning and spill prevention activities, improved preparedness and response capabilities, and ensures that responsible parties pay for oil spill cleanups.
Occupational Safety and Health Act of 1970 as Amended 2004 (29 U.S.C. 651 et seq.)	Establishes the framework for safe and healthful working conditions by authorizing enforcement of the standards.
State	
Hazardous Substances Account Act (RCW 70.105 et seq.)	Regulates proper site characterization and site remediation of hazardous materials (Health and Safety Code Section 25300 et seq.).
Sediment Management Standards (WAC 173-204)	Establishes rules used to manage sediment in Washington through standards that apply to sediment quality and reduced pollutant discharges.
Model Toxics Control Act (RCW 70.105D and WAC 173-340)	Establishes a toxic waste cleanup law.
Dangerous Waste Regulations (WAC 173-303)	Provides authorities and standards for designating, tracking, generator management, and safely disposing of dangerous solid wastes.
Facility Oil Handling Standards (WAC 173-180)	Establishes facility oil handling standards.
Hazardous Waste Operations (WAC 296–843)	Provides regulations for employees working in operations, investigations, or clean-up operations at sites with hazardous waste.
Water Rights—Oil and Hazardous Substance Spill Prevention and Response "Oil Spill Act" (RCW 90.56)	Establishes programs to reduce the risk and develop an approach to respond to oil and hazardous substance spills; provides a simplified process to calculate damages from an oil spill; holds responsible parties liable for damages resulting from injuries to public resources.
Oil Spill Natural Resources Damage Assessment (WAC 173-183)	Establishes procedures for convening a resource damage assessment committee, preassessment screening of damages, and selecting the damage assessment method.
Local	
No local laws or regulations apply to hazardous materials.	

U.S.C. = United States Code; CFR = Code of Federal Regulations; RCW = Revised Code of Washington; WAC = Washington Administrative Code

3.14.3 How were hazardous materials impacts evaluated?

This section describes the sources of information and methods used to evaluate impacts.

3.14.3.1 Information Sources

The following regulatory databases provided information to identify potential hazardous materials issues associated with past and present operations at the project site and adjacent properties within 0.25 mile of the project site.

- Federal National Priorities List
- Delisted National Priorities List Database
- Resource Conservation and Recovery Act Information (RCRA)
- RCRA Large-Quantity Generator
- Federal Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS)
- Federal CERCLIS No Further Remedial Action Planned
- Federal Corrective Action Sites
- Federal Emergency Response and Notification System
- Toxic Chemical Release Inventory System
- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (42 U.S.C. 103) or Superfund Consent Decrees
- Hazardous Sites List
- Leaking Underground Storage Tank (LUST)
- Spills
- Independent Cleanup Reports
- Facility/Site Identification System Listing (ALLSITES)
- Confirmed and Suspected Contaminated Sites—No Further Action (CSCSL NFA)
- Hazardous Waste Manifest Information (MANIFEST)
- Facility Index System/Facility Registry System (FINDS)
- Voluntary Cleanup Program (VCP)

Information about the physical properties and risks of bulk liquids that could be used under the proposed action was obtained from the applicant and environmental site assessments recently completed in the study area. Regulatory agency databases reviewed included the U.S. Environmental Protection Agency (EPA) and Washington State Department of Ecology (Ecology) databases and an Environmental Data Resources Radius Map Report for applicable environmental records.

3.14.3.2 Impact Analysis

Impacts related to hazardous materials were determined by reviewing the information sources above for sites within 0.25 mile of the project site, reviewing information about the physical properties and risks of materials that could be handled and used under the proposed action, and considering proposed construction and operation activities under the proposed action.

3.14.4 What hazardous materials are in the study area?

This section describes hazardous materials in the study area that could be affected by construction and routine operation of the proposed action.

3.14.4.1 Past Uses and Risk of Potential Contamination

The project site was a boat slip between the 1920s and 1980s. The site was backfilled in 1990 with material dredged from Grays Harbor and capped with log yard fill and material from various projects in the area. Fill material has occasionally been placed on the property since that time and as recently as 2011.

The project site was identified as a CERCLIS (42 U.S.C. 103) site for an emergency response incident that occurred on December 2, 2009. A 10,000-gallon mixing tank using sulfuric acid became over-pressurized and exploded, rupturing two adjacent sulfuric acid tanks and spilling the contents into the containment area. The facility is listed as having been cleaned up.

A Phase I Gap Analysis and Phase II Environmental Site Assessment were conducted in November 2012 for the project site (GeoEngineers 2012). The intent of the Phase II assessment was to establish baseline conditions prior to leasing the property and to address any Recognized Environmental Conditions.

Phase II assessment activities included collection of soil and groundwater samples. Oil-range petroleum hydrocarbons, naphthalenes, and carcinogenic polycyclic aromatic hydrocarbons were detected at concentrations greater than cleanup levels in the soil sample collected from one of the borings. Contaminants either were not detected or were detected at concentrations less than cleanup levels in the remaining analyzed soil samples. Additionally, oil-range petroleum hydrocarbons were detected at concentrations greater than cleanup levels in groundwater samples at two of the boring locations.

An additional investigation was conducted in February 2013 to evaluate the lateral and vertical extent of onsite contaminated soil (GeoEngineers 2013). The investigation concluded that soil affected by oil-range petroleum hydrocarbons, carcinogenic polycyclic aromatic hydrocarbons, and naphthalenes at concentrations greater than industrial cleanup levels appears to be limited to the area around the initial boring. The investigation also determined that contaminants may be present in soil in other areas of the property. This determination was based on the amount of wood debris observed in the fill material during the investigation and the variable source and placement of the fill material.

Based on information obtained from past environmental site assessments relevant to the study area, six Recognized Environmental Conditions were identified in the study area: one at the project site and five within 0.25 mile of the project site (Table 3.14-2).

Table 3.14-2. Recognized Environmental Concerns in the Study Area

Site Name	Address and Distance from Project	Environmental Databases	Status
Grays Harbor Transportation Authority	705 30th Street, Hoquiam. Located approximately 0.25 mile northwest of the project site.	ALLSITES, LUST	Affected soil only. Case opened in 1991 and received NFA status in August of 2012.
Hoquiam School District Transportation Center	3030 Bay Avenue, Hoquiam. Located approximately 0.23 mile northwest of the project site.	ALLSITES, LUST, MANIFEST, RCRA Info, VCP	Affected soil only. Case opened in 1998 and was later granted NFA status in 1999 under Ecology's VCP. In 2010, two violations were issued to the site under the Ecology Dangerous Waste Regulation (WAC 173-303). Compliance was achieved that same year.
Imperium Grays Harbor (project site)	3122 Port Industrial Road, Hoquiam	ALLSITES, CERCLIS, MANIFEST, EPA Echo, RCRA Info	This facility is a large-quantity generator. Ecology inspection of the facility found 7 violations in 2011 and 6 violation in 2014 respectively. Ecology received confirmation that all violations were corrected.
Paneltech Products, Inc.	2999 John Stevens Way, Hoquiam. Located approximately 200 feet northwest of the project site, across John Stevens Way.	ALLSITES, FINDS, MANIFEST, RCRA Info, SPILLS, VCP	Approximately 375 gallons of phenol spilled on site December 2005. Soil and groundwater were affected. Site was granted NFA under the VCP in June 2010. . Two violations and one violation were found at the facility during Ecology dangerous waste inspection in 2013 and 2014 respectively. Both violations were corrected.
Pettit Oil (Tosco/Unocal Bulk Plant No. 0291)	640, 700, and 820 Myrtle Street, Hoquiam. Located approximately 0.10 mile north of the project site.	ALLSITES, CSCSL, FINDS, SPILLS	A 100- to 200-gallon gasoline spill occurred in 1993. The site was listed in the CSCSL for the contamination of soil and groundwater. An assessment conducted in 1997 revealed gasoline, diesel, and oil-range hydrocarbons above cleanup levels in soil and groundwater. The site status is listed by Ecology as 'cleanup started'.

Site Name	Address and Distance from Project	Environmental Databases	Status
Westport Shipyard, Inc.	2850 John Stevens Way, Hoquiam. Located approximately 200 feet northwest of the project site across John Stevens Way.	ALLSITES, FINDS, WAC 173-303, RCRA	Listed as a medium-quantity generator (Dangerous Waste Regulation, WAC 173-303), generating between 100 and 1,000 kilograms of hazardous waste per month. Ten informal violations have been issued with compliance achieved.

ALLSITES = Facility/Site Identification System Listing; LUST = Leaking Underground Storage Tank ; NFA = No Further Action; MANIFEST = Hazardous Waste Manifest Information; RCRA = Resource Conservation and Recovery Act Information; VCP = Voluntary Cleanup Program; Ecology = Washington State Department of Ecology; CESQG = Conditionally Exempt Small-Quantity Generator; CERCLIS = Federal Comprehensive Environmental Response, Compensation, and Liability Information System; FINDS = Facility Index System/Facility Registry System; CSCSL = Confirmed and Suspected Contaminated Sites; WAC = Washington Administrative Code

3.14.4.2 Existing Operations

As described in Chapter 2, *Proposed Action and Alternatives*, the applicant currently operates a biodiesel production and distribution facility. Biodiesel production at the project site involves receiving, storing, loading (for transport), and using various materials on site. Biodiesel inputs (primarily vegetable oil and methanol) and process chemicals (sulfuric acid and liquid nitrogen) are unloaded and used on site and finished products (biodiesel and glycerin) are stored and loaded for transport. The chemical properties of these materials are described in Table 3.14-3.

Table 3.14-3. Chemical Properties of the Existing Materials

Products	Densities	Properties and Potential Release Behavior
Methanol	Specific gravity 0.79; API 47.49	Floats on water; toxic; relatively low flash point and higher degree of volatility; infinitely soluble in water.
Used cooking oil	Specific gravity 0.90–0.92; API 22.30–25.72	Floats on water; generally readily metabolized by bacteria that break down fats and oils in the environment; insoluble in water. Lower acute toxicity due to high proportion of plant-based oils.
Biodiesel	Specific gravity 0.86–0.90; API 25.72–33.03	Floats on water; relatively high flash point and lower vapor pressure. Oil constituents typically exhibit low evaporation and dissolution; variable solubility in water.
Sulfuric acid	Specific gravity 1.84; API 76.9	Sinks in water; highly toxic and corrosive; nonflammable; relatively lower volatility; soluble in water at all concentrations.
Liquid nitrogen	Specific gravity 0.81; API 43.19	Floats on water; acutely toxic; relatively high degree of volatility and low flammability; not soluble in water.
Glycerin	Specific gravity 1.26; API 19.2	Sinks in water; acutely toxic; relatively lower vapor pressure, higher flash point and boiling point, less flammable. A low degree of volatility allows glycerin to be completely soluble in water.
Sodium methylate	Specific gravity 0.96; API 15.9	Floats on water; toxic; relatively lower vapor pressure, higher boiling point, similar flash point, lower degree of volatility. Insoluble in water, forms hydrolytic reaction.

Source: Cheremisinoff 2000

Small amount of chemicals are also handled, stored, and transported on site related to routine operations. These include hazardous materials such as fuels used in facility vehicles, solvents, cleaning agents, paints, oil filters, used oil, batteries, aerosol cans, and fire-fighting foam.

As described in Chapter 2, *Proposed Action and Alternatives*, rail loading and unloading spots used for chemicals, truck loading and unloading locations, and storage tank areas are underlain with secondary containment that drains to a collection sump. Under existing conditions, the applicant requires that personnel attend training to be certified to handle hazardous materials and to respond to minor releases consistent with the Occupational Safety and Health Administration standards pertaining to hazardous materials (29 Code of Federal Regulations [CFR] 1910 Subpart H).

Because biodiesel and vegetable oil are considered oils as defined by the state and federal governments, the applicant operates the existing facility consistent with the requirements of the Clean Water Act (33 U.S.C 1251 et seq.), the Oil Pollution Act (33 U.S.C. 2701 et seq.), and Washington Administrative Code (WAC) 173-180, Facility Oil Handling Standards. The applicant currently has an integrated contingency plan to reduce the potential for releases of oil (e.g., vegetable oil and biodiesel) or other hazardous materials and to clarify emergency notification and response protocols during site operations and vessel transfers; however, this plan and any related measures would need to be updated to include consideration of the newly proposed liquids.

3.14.5 What are the potential hazardous materials impacts?

This section describes hazardous materials impacts that could occur in the study area. Potential mpacts of the no-action alternative are described first, followed by potential impacts of the proposed action.

3.14.5.1 No-Action Alternative

Under the no-action alternative, the applicant would continue to operate its existing facility as described in Chapter 2, Section 2.1.2.2, *Existing Operations,* and summarized above. Biodiesel inputs (primarily vegetable oil and methanol), process chemicals (sulfuric acid and liquid nitrogen), and finished products (biodiesel and glycerin) would continue to be transported to and from the project site, and handled, stored, and used on site as described in Chapter 2.

The risks of exposure would be related primarily to the handling and storage of hazardous materials such as fuels used in facility vehicles, solvents, cleaning agents, paints, oil filters, used oil, batteries, aerosol cans, and fire-fighting foam and would be similar to existing conditions. Minor releases of these chemicals and those stored in bulk, including methanol, vegetable oil, sulfuric acid, liquid nitrogen, sodium methylate, biodiesel, and glycerin, could occur during routine operations as the result of human error (e.g., improper use, not following required handling and storage protocols) or minor equipment failure (e.g., leaking vehicles or minor hose leaks). These releases would most likely be relatively small and easily contained within the existing containment facilities.

Similar to existing conditions, the applicant would continue to require that personnel attend training to be certified to handle hazardous materials and to respond to minor releases consistent with the Occupational Safety and Health Administration standards pertaining to hazardous materials (29 CFR 1910 Subpart H). Additionally, the applicant would continue to comply with applicable regulations to implement safety and spill prevention and response protocols to reduce the release of hazardous materials.

There would also be the continued potential for larger-scale incidents to occur, primarily with respect to chemicals stored in bulk. Such events could result in more extensive release scenarios. Similar to existing conditions, the probability of larger-scale releases (such as might occur during unloading and loading or during transport) would continue to be relatively low. These risks are discussed in Chapter 4, *Environmental Health and Safety*. However, if larger bulk liquid spills of biodiesel-related products were to occur, they could result in adverse impacts on humans or the environment. For example, biodiesel is a skin irritant and can be toxic to eyes, and at high concentrations, biodiesel can affect the central nervous system of humans. For additional information about the risks and environmental consequences related to the release of hazardous materials associated with the no-action alternative, see Chapter 4, *Environmental Health and Safety*.

3.14.5.2 Proposed Action

This section describes hazardous materials impacts that could occur in the study area as a result of construction and routine operation of the proposed action.

Construction

Construction activities would involve the transport, handling, storage, and disposal of hazardous materials such as fuels, solvents, paints, oils, and grease. Although there is a potential for incidents to occur that could expose people or the environment to these materials, construction activities would be conducted in a manner compliant with applicable regulations (Section 3.14.2). Specifically, transport, handling, storage, and disposal would comply with the requirements of RCRA and Washington's Dangerous Waste Regulations (WAC 173-303-145). Additionally, the construction contractor would be required to have certified personnel and a health and safety plan that comply with the Occupational Safety and Health Administration's Safety and Health Regulations for Construction (29 CFR 1926). Compliance with this standard would ensure implementation of best management practices to reduce human exposure to potential contaminants.

Construction activities could also result in the disturbance of potentially contaminated soils. As noted in Section 3.14.4.1, *Past Uses and Risk of Potential Contamination*, some site contamination was found during past environmental site assessments (GeoEngineers 2012, 2013). As indicated in these studies, additional measures would be required to mitigate the potential for environmental exposure to hazardous materials during construction. These measures are discussed in Section 3.14.7.2, *Applicant Mitigation*, consistent with state requirements pursuant to WAC 173-204.

The proposed action could also encounter contamination from Recognized Environmental Conditions outside the project site. As mentioned above, six sites located within 0.25 mile of the project site were further analyzed. Four of the sites (Paneltech Products, Inc., Westport Shipyard, Inc., Hoquiam School District Transportation Center, and Grays Harbor Transportation Authority) had previous violations but are now in compliance with Ecology standards. One site (Imperium Grays Harbor) was listed as a large-quantity generator. Ecology inspection of the facility found seven violations in 2011 and six violations in 2014. Ecology received confirmation that all violations were corrected. The remaining site (Pettit Oil) is active under Ecology's Toxic Cleanup Program and noted as having contaminated soil and groundwater. This site is located north and approximately 0.23 mile upgradient of the project site. Because this site is located upgradient and only 0.23 mile away, it is possible that contamination migrating (via groundwater) from the Pettit Oil site could have affected the project site. Groundwater depth in the project area is approximately 10 feet below ground surface (Insight Geologic 2012). The site status is listed by Ecology as 'cleanup started'. Although

impacts could occur during construction, implementation of measures summarized in Section 3.14.7.2, *Applicant Mitigation*, would further reduce impacts related to historically contaminated sites adjacent to the project site.

Operations

This section describes the impacts of the proposed action that could result from routine operations at the project site.

Under the proposed action, the applicant would continue to operate the biodiesel production facility similar to existing conditions. Because operations related to these activities would not change, the risks of exposure of workers to hazardous materials associated with biodiesel production, including the handling, use, storage, and transport of biodiesel inputs and finished products, would remain the same as the no-action alternative.

As discussed in Chapter 2, *Proposed Action and Alternatives*, the proposed action would entail the construction and operation of new facilities to support unloading, storing, and loading (for transport) bulk liquids (Table 3.14-4). . Table 3.14-4 provides information about the chemical properties of these bulk liquids and potential behavior upon release. All of the bulk liquids contain many different hydrocarbons and include trace levels of other chemicals.

Table 3.14-4. Chemical Properties of the Proposed Bulk Liquids

State or Condition	Products	Density	Properties and Potential Release Behavior
Petroleum-Based Fuels			
Unrefined	Bakken crude oil	Specific gravity 0.8–0.86; API average 42.66 (minimum 47.07, maximum 38.60) (highly variable)	Typically floats on water; acutely toxic in undiluted form; compared with most other crude oils, higher gas content, higher vapor pressure, lower flash point and boiling point, higher degree of volatility, and increased ignitability and flammability
	Diluted bitumen	Specific gravity and API (highly variable)	Floats, submerges, and/or sinks depending on temperature, and specific gravity/API value of the particular oil shipment and type of diluent added; diluent typically volatile and acutely toxic; oil constituents typically exhibit low evaporation and dissolution.
Refined	Gasoline	Specific gravity 0.79; API 46–49	These materials typically float because their specific gravity is less than that of water (specific gravity of water = 1.0) and their API is greater than 10 degrees; generally volatile and highly flammable; evaporate to air and dissolve into water relatively rapidly; low viscosity and can migrate into sediments; direct contact can cause acute toxicity to plants and animals
	Kerosene	Specific gravity <0.8; API 45	
	Naptha	Specific gravity <0.8; API 55	
	Jet fuels	Specific gravity 0.76–0.82; API = 37–51	
	No. 2 fuel oil (diesel oil)	Specific gravity 0.86; API	
	No.6 fuel oil (bunker c oil)	Specific gravity 0.95–1.03; API 5.2 - 23.1	Behaves more like crude oil (see below)
	Vacuum gas oil	Specific gravity 0.93; API NA	Behaves more like crude oil (see below)
Non-Petroleum Fuels			
Pure (unblended)	Ethanol	Specific gravity 0.79; API 46–49	Floats on water; generally readily metabolized by bacteria that break down fats and oils in the environment. Less acutely toxic that petroleum fuels and crude oils due to high proportion of plant-based oils.
Can be composed of 20–80% of plant-based fuel	Renewable jet fuel	Specific gravity 0.76–0.82	
Can be composed of 20–80% of plant-based fuel	Renewable diesel	Specific gravity 0.86–0.90; API (variable)	
Variable composition	Used cooking oil/animal fat	Specific gravity; corn oil (0.92), animal fat (0.92–0.94)	

Sources: American Petroleum Institute 2004; Chevron Corporation 2007; Curl and O'Donnell 1977; Kimble 2014; M. J. Bradley & Associates 2009; National Renewable Energy Laboratory 2001; Owolabi et al. 2011, Renewable Fuels Association nd; American Petroleum Institute 2010; National Biodiesel Board nd
API = American Petroleum Institute

Petroleum-Based Fuels

As described in Chapter 2, *Proposed Action and Alternatives,* under the proposed action, bulk liquids would be unloaded, stored in the proposed tanks, and loaded for offsite transport. The additional capacity provided under the proposed action would most likely be dedicated to handling and storage of crude oil.

Unrefined

Crude Oil

Crude oil, the liquid form of petroleum, is typically classified as light, medium, or heavy depending on how light or heavy it is compared to water, also referred to its American Petroleum Institute (API) gravity. Crude oil is mostly a mixture of naturally occurring hydrocarbons that can be distilled to create a variety of products. Gasoline, propane, butane, methane, kerosene, diesel, and lubricating oils are some of the products that come from crude oil distillation and processing. Distillation and processing are not part of the proposed action. Crude oil can come from a variety of sources. Under the proposed action, it is anticipated that crude oil would come from the Bakken formation in the Intermountain Region and central United States or in the form of diluted bitumen derived from oil sands from Alberta, Canada. The unique properties of these oils are discussed below.

Bakken Crude Oil

Bakken crude oil is a light, sweet (low sulfur) crude oil with an average API gravity between 38 and 47 degrees. Bakken crude oil typically contains higher amounts of dissolved flammable gases compared to some heavier crude oils, making it a Class III Flammable Liquid.[3] Bakken crude oil is acutely toxic to all types of organisms in undiluted form. It also exhibits higher vapor pressure, lower flash and boiling points and thus a higher degree of volatility, along with increased ignitability and flammability, compared to most other crude oils.

Diluted Bitumen

Diluted bitumen refers to bitumen that has been diluted with at least one lighter petroleum product to make it easier to transport. Diluted bitumen is also referred to as dilbit or Canadian tar sands oil. Bitumen is a heavy, dark, black viscous oil. It differs from light oils in its high viscosity, high density (low API gravity), and significant content of nitrogen, oxygen, sulfur, and heavy metals. Bitumen is derived from oil sand deposits, which consist of a combination of clay, sand, water, and bitumen. Oil sands are typically mined (not pumped because they are highly viscous) and then processed to extract the oil-rich bitumen. Most heavy oils are found at the margins of geologic basins and are thought to be the residue of light oils that have lost their light-molecular-weight components through degradation by bacteria, water-washing, and evaporation. Typically, the ratio of bitumen to diluent is 70:30 or 30% diluent.

[3] As defined by the Occupational Safety and Health Administration, a Class III flammable liquid has a flashpoint (the temperature at which a particular organic compound gives off sufficient vapor to ignite in air) at or above 140ºF (60°C).

Refined

Gasoline

Gasoline is a complex combination of hydrocarbons including paraffins, cycloparaffins, aromatic hydrocarbons, and olefinic hydrocarbons. Gasoline is a highly flammable liquid that can travel along the ground to ignition sources. It is irritating to the mouth, throat, and intestinal tract and can cause reddening, itching, and inflammation in contact with skin. Exposure to humans can occur via inhalation, dermal absorption, or ingestion.

Kerosene

Kerosene is a mixture of liquid hydrocarbons obtained by distilling petroleum or bituminous shale, and widely used as a fuel and cleaning solvent. Kerosene is a combustible liquid and vapor. In high concentrations, vapors and spray mists are narcotic via inhalation and can cause headache, fatigue, dizziness, and nausea. Kerosene exhaust fumes have been reported to be an occupational hazard because of their carcinogenic properties. Exposures can occur via inhalation, dermal absorption, or ingestion.

Naphtha

Naphtha is a hydrocarbon mixture obtained from the distillation of petroleum or coal tar. It is used primarily as feedstock for producing high-octane gasoline. It is also used as a diluent in the refining of diluted bitumen. Common products made with naphtha include solvents, varnishes, and adhesives. Naphtha is a flammable liquid and is an irritant to skin, eyes, nose, and throat. Exposure could occur via inhalation, dermal absorption, or ingestion.

Jet Fuel

Jet fuel is a complex blend of hydrocarbons derived from various refinery streams. It is a type of aviation fuel designed for use in aircraft powered by gas-turbine engines.

No.2 Fuel Oil

No. 2 fuel oil is a distillate home heating oil, similar to diesel fuel. Both are typically obtained from a light gas oil cut. No. 2 fuel oil is sometimes referred to as diesel oil, being composed of approximately 25% aromatics. It is moderately soluble in water and is relatively volatile. No. 2 fuel oil is less toxic than No. 1 fuel oil, but more toxic than fuel oils No. 3 through No. 6 principally because it has a higher concentration of aromatics. Its principal use is for domestic and commercial burners.

No.6 Fuel Oil

No. 6 fuel oil is a high-viscosity residual oil. It requires preheating to 220 to 260°F before it can be pumped. It can contain various undesirable impurities, including 2% water and 50% percent mineral oil that often contain sulfur and nickel and other heavy metals. The average composition of this high-molecular-weight material is 15% alkanes (paraffins); 15% polar compounds containing nitrogen, oxygen, or sulfur; 25% aromatics; and 45% cyclic alkanes (naphthenes). Historically, it has been used in large commercial boilers and a marine fuel.

Vacuum gas oil

Vacuum gas oil is feedstock for fluid catalytic cracker used to make gasoline, No. 2 oil, and other byproducts. The material is flammable and vapors and gases can be irritants to the eyes, skin, and respiratory system. Ingestion and inhalation can cause damage to the central nervous system.

Non-Petroleum

Plant-based products are most likely to be used in the production of biodiesel and would be handled, stored, and transported in a manner similar to existing conditions as described in Chapter 2, *Proposed Action and Alternatives*.

Ethanol

Ethanol is a renewable, domestically produced alcohol fuel made from plant material such as corn, sugar cane, or grasses. Ethanol is a flammable and poisonous liquid and could contain additives or residual contaminants. Exposure could occur via inhalation, absorption, or ingestion.

Renewable Jet Fuel

Renewable jet fuel is a complex blend of hydrocarbons derived from various refinery streams originating from plant material. It is an aviation fuel designed for use in aircraft powered by gas-turbine engines. Renewable jet fuel is a combustible liquid and vapor. In high concentrations, it can cause central nervous system effects, and it is a suspected carcinogen.

Renewable Diesel

Renewable diesel is derived from plant material and intended for use as a refinery feedstock, fuel, or for use in engineered processes. Renewable diesel is an extremely combustible liquid and vapor. In high concentrations, it can cause central nervous system effects.

Used Cooking Oil and Animal Fats

Biofuels are manufactured from animal fats and recycled cooking oils. Animal fats are produced when the animal consumes plants or animals. Used cooking oils are mostly plant based, but may also contain animal fats. Biofuels generally do not contain hazardous materials and are considered safe. Inhalation hazards from biofuels are negligible unless materials are heated to produce vapors. Prolonged or repeated dermal contact is not likely to cause significant skin irritation. No hazards are anticipated from ingestion incidental to industrial exposure.

New capacity related to the proposed facilities would be dedicated to handling and storing bulk liquids. Primary operations would include unloading bulk liquids, transferring them to above-ground storage tanks, and loading them for offsite transport; and routine facility maintenance work (e.g., tank cleaning, equipment maintenance). As noted in Chapter 2, *Proposed Action and Alternatives*, some of the liquids would most likely be used on site in the biodiesel production facilities. Although the unloading, storage, and loading of bulk liquids would occur in a manner similar to existing operations, there is increased risk of exposure of people (primarily workers) and the environment due to the increase in throughput compared to the no-action alternative and increased consequences to human health and the environment due to the additional hazardous materials, namely crude oil.

Similar to existing conditions, exposure to hazardous materials associated with routine operations under the proposed action would be most likely to occur during unloading and loading activities. Most likely causes would continue to be human error (e.g., misuse of equipment, inadequate application of health and safety procedures, improper implementation of specific handling requirements) or minor equipment failure (e.g., small valve leak), resulting in incidental spills or exposure to other hazards (e.g., dermal absorption, inhalation exposure, small fires, slips and falls).

These risks would routinely result in minor releases that would be easily contained and cleaned up by onsite personnel. As noted in Chapter 2, *Proposed Action and Alternatives,* and consistent with the regulations outlined in Section 3.14.2 (Facility Oil Handling Standards, WAC 173-180; Clean Water Act [33 U.S.C 1251 et seq.] and the Oil Pollution Act [33 U.S.C. 2701 et seq.]), the proposed facilities would be designed and operated to meet the appropriate safety standards as a designated oil facility. Specifically, the facilities would be designed to meet primary and secondary containment standards in the event of an oil spill. Additionally, the applicant would be required to update the integrated contingency plan to reduce the potential for releases of crude oil or hazardous materials and to clarify emergency notification and response protocols during site operations and vessel transfers. Similar to existing conditions, the applicant would also continue to ensure that personnel training and handling and storage activities would also comply with the appropriate safety standards intended to reduce the risks of incidents and to address potential spills during operation.

Because the potential consequences of an incident (e.g., a spill during vessel loading, tank rupture), depend on the specific circumstances of each event (e.g., location, size of the release, land or water based, etc.), a risk analysis was conducted to frame the analysis of impacts and to be able to characterize the potential changes in risks of exposure of people and the environment to hazardous materials associated with the proposed action. This analysis is presented in Chapter 4, *Environmental Health and Safety*, and addresses potential risks during onsite operations and offsite rail and vessel transport.

3.14.6 What required permits and plans apply to hazardous materials?

The following permit conditions and required plans are expected to reduce impacts related to hazardous materials.

- City of Hoquiam Fire Department Permit
  - Fire prevention and suppression requirements
- City of Aberdeen Fire Department Permit
  - Fire prevention and suppression requirements
- City of Aberdeen Utility Services Agreement
  - Communication and coordination
- Washington State Department of Ecology National Pollutant Discharge Elimination System Construction Stormwater General Permit and Industrial Stormwater Permit
  - Discharge/ effluent limits
  - Monitoring, sampling, and reporting requirements
  - Operations and maintenance plan

  - Stormwater pollution prevention plan
  - Onsite spill control material provision requirements
  - Stormwater pollution prevention plan preparation requirement
  - Stormwater BMP development and implementation
  - Spill prevention control and countermeasures plan preparation requirement
  - Industrial discharge best management practice development and implementation
  - Personal protective equipment plan for use, storage, and maintenance
- Integrated Contingency Plan to satisfy federal and state oil spill prevention and contingency planning and facility operations requirements
  - Evaluation of onsite safety and health hazards
  - Pre-emergency planning and coordination with outside organizations
  - Roles and responsibilities in an emergency
  - Evacuation routes and emergency alert and response protocols
  - Oil and hazardous material transfer operation protocols
  - Containment and countermeasures to prevent oil spills from entering navigable waterways
  - Notification procedures
  - Spill mitigation procedures
  - Facility response activities
  - Training and exercise procedures
  - Equipment descriptions: emergency shutdown system, containment, fire fighting

3.14.7 What mitigation measures would reduce hazardous materials impacts?

This section describes the applicant mitigation that would reduce hazardous materials impacts form the construction and routine operation of the proposed action.

3.14.7.1 Applicant Mitigation

The applicant will implement the following mitigation.

- To address odiferous, stained, or discolored groundwater or soil encountered during construction activities, or if groundwater encountered is suspected to be contaminated during construction activities, the following mitigation measures will be implemented.
  - The applicant will seek the professional recommendation of a consultant specializing in the handling and identification of hazardous materials and contaminated media.
  - If deemed necessary, based on the above consultation, the applicant will conduct soil and/or groundwater testing for identification of possible hazardous materials.

- Construction personnel will isolate and cover suspect soil until analytical results are reviewed by qualified personnel.
- The consultant will compare analytical results to the applicable EPA's regional screening levels, which address common environmental pollutants. If hazardous materials are discovered in the soils and/or groundwater at levels above the regional screening levels, the consultant will provide recommendations on the steps required for proper treatment and/or removal and disposal of the contaminated media.

- Due to existing previously identified contamination at the project site, during excavation and grading activities, the applicant and the earthworks contractor will implement the following mitigation.
  - The applicant will require that the earthworks contractor comply with training requirements for handling of contaminated material. This recommendation is consistent with WAC 296-843-100, Hazardous Waste Operations, which indicates that onsite employees are required to have current health and safety training in accordance with Hazardous Waste Operations and Emergency Response requirements in Occupational Safety and Health Administration 29 CFR 1910.120.
  - Onsite workers working within a contaminated zone will be required to comply with Occupational Safety and Health Administration 29 CFR 1910.120, if contaminants are detected in soil at concentrations greater than the Model Toxics Control Act Method A Unrestricted Land Use cleanup levels (WAC 173-340).
  - The applicant will prepare a soil management plan to provide appropriate procedures for handling, sampling, transporting, placing, and disposing of the media generated during construction of the proposed action.
  - The construction contractor will handle soil excavated from the project site in accordance with all local, state, and federal regulations.

3.14.8 Would the proposed action have unavoidable and significant adverse hazardous materials impacts?

Compliance with the applicable regulations and permit conditions along with implementation of the mitigation measures described above would reduce hazardous materials impacts. There would be no unavoidable and significant adverse impacts related to routine operations. Potential impacts related to spills are addressed in Chapter 4, *Environmental Health and Safety*.

3.15 Rail Traffic

Railroads provide transportation services for passengers and commercial goods and support regional economic activity. Rail traffic in the study area consists of commercial goods, industrial products, agricultural commodities, and garbage. Similar to other forms of transportation, rail traffic is subject to various regulatory requirements governing maintenance of infrastructure standards, allowable speed limits, and methods and types of goods and services that can be transported.

This section describes rail traffic in the study area, including rail lines and subdivisions, rail yards, connections with the main lines, freight traffic, capacity, and rail operations at the project site. It then describes impacts on rail traffic that could result under the no-action alternative or as a result of the construction and routine operation[1] of the proposed action. Finally, this section presents any measures identified to mitigate impacts of the proposed action on rail traffic and any remaining unavoidable and significant impacts.

3.15.1 What is the study area for rail traffic?

The study area for rail traffic consists of the Puget Sound & Pacific Railroad (PS&P)[2] rail line, including the PS&P rail line junction with the BNSF Railway (BNSF)[3] main line in Centralia that could be affected during routine rail transport. Figure 3.15-1 illustrates the location of the PS&P rail line in relation to other rail lines in northwest Washington. Figures 3.15-2 and 3.15-3 present the general route of the PS&P rail line. Impacts related to increased rail and vessel traffic beyond the study area are described in Chapter 5, *Extended Rail and Vessel Transport*.

[1] Chapter 4, *Environmental Health and Safety*, addresses the potential impacts from increased risk of accidents (e.g., storage tank failure, train derailments, vessel collisions) and related consequences (e.g., release of crude oil or other proposed bulk liquids).

[2] The PS&P rail line refers to the rail line between Centralia and the project site (which is called the Elma Subdivision by PS&P). For more information on PS&P subdivisions, see Section 3.15.4.1, *Rail Service between Centralia and Hoquiam*.

[3] Throughout this section, reference to the BNSF main line includes trains operated by the BNSF Railway Company (BNSF) and the Union Pacific Railroad (UP). BNSF owns the tracks that serve PS&P at Centralia. An operating agreement between the BNSF and UP, however, allows UP to use BNSF's tracks and also serve PS&P. When a freight train transfers to the PS&P rail line from the BNSF main line, depending on the operator of that train, either BNSF or UP crews oversee the operation.

Figure 3.15-1. PS&P Rail Line in Regional Rail Context

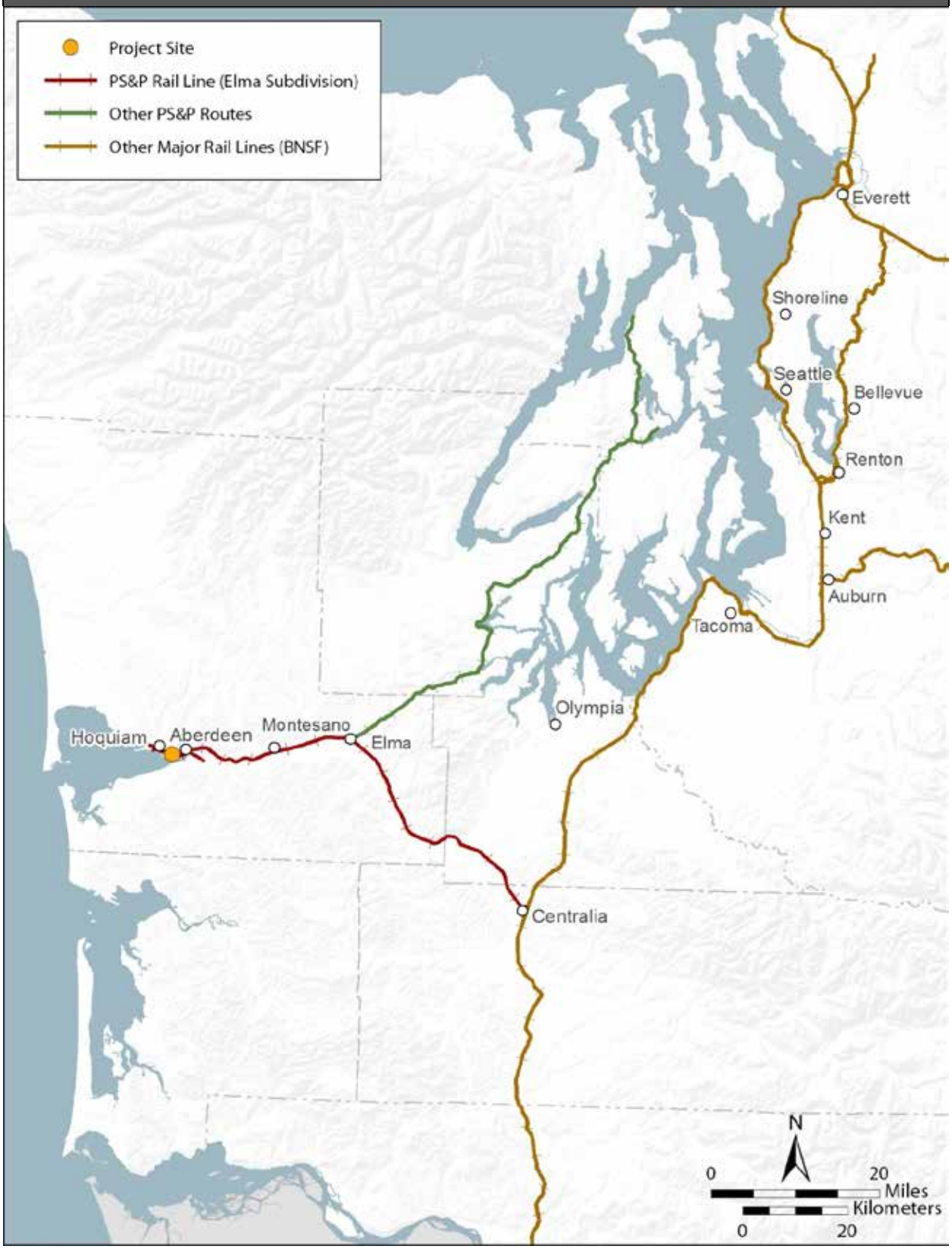


Figure 3.15-2. PS&P Rail Line General Route (East)

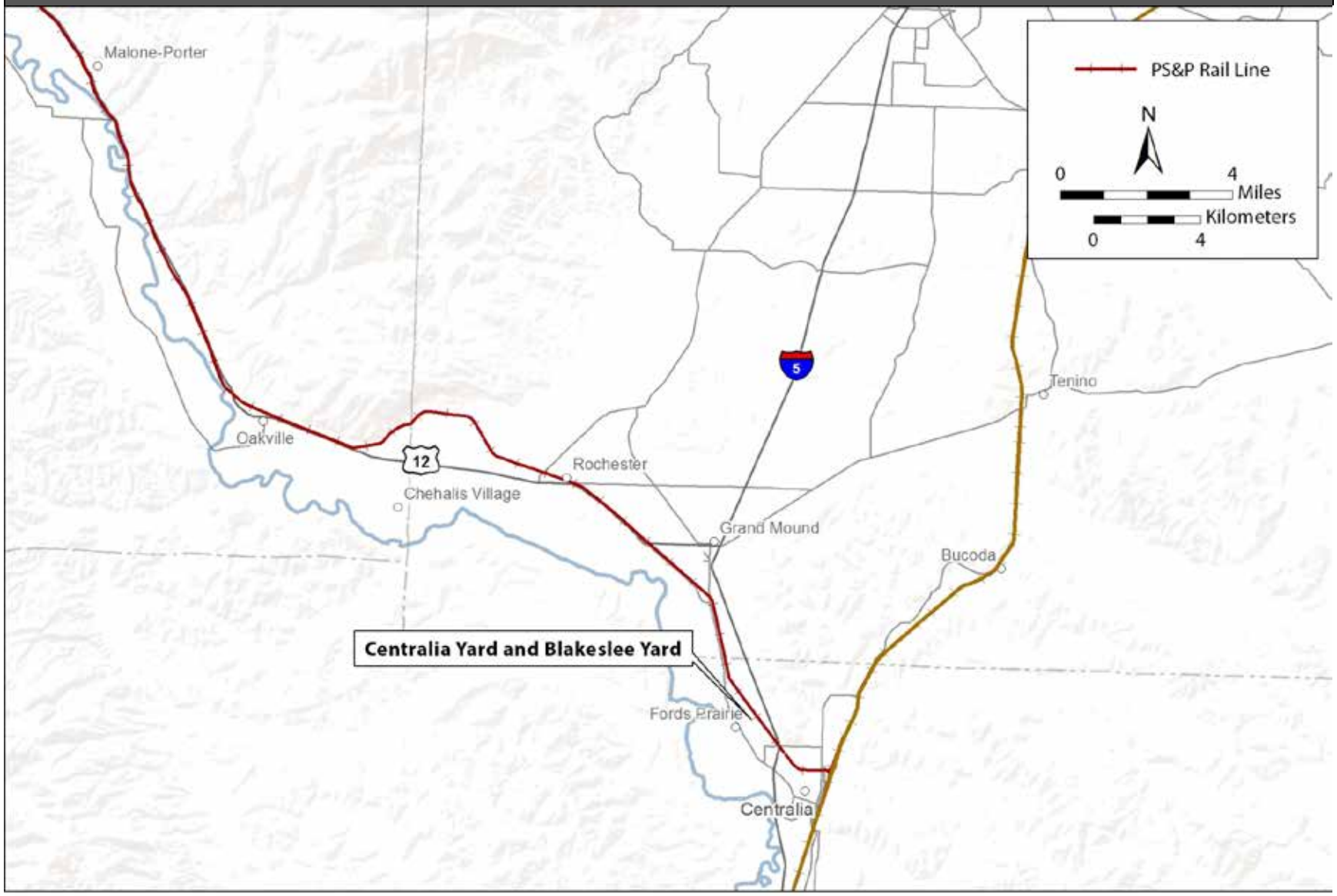
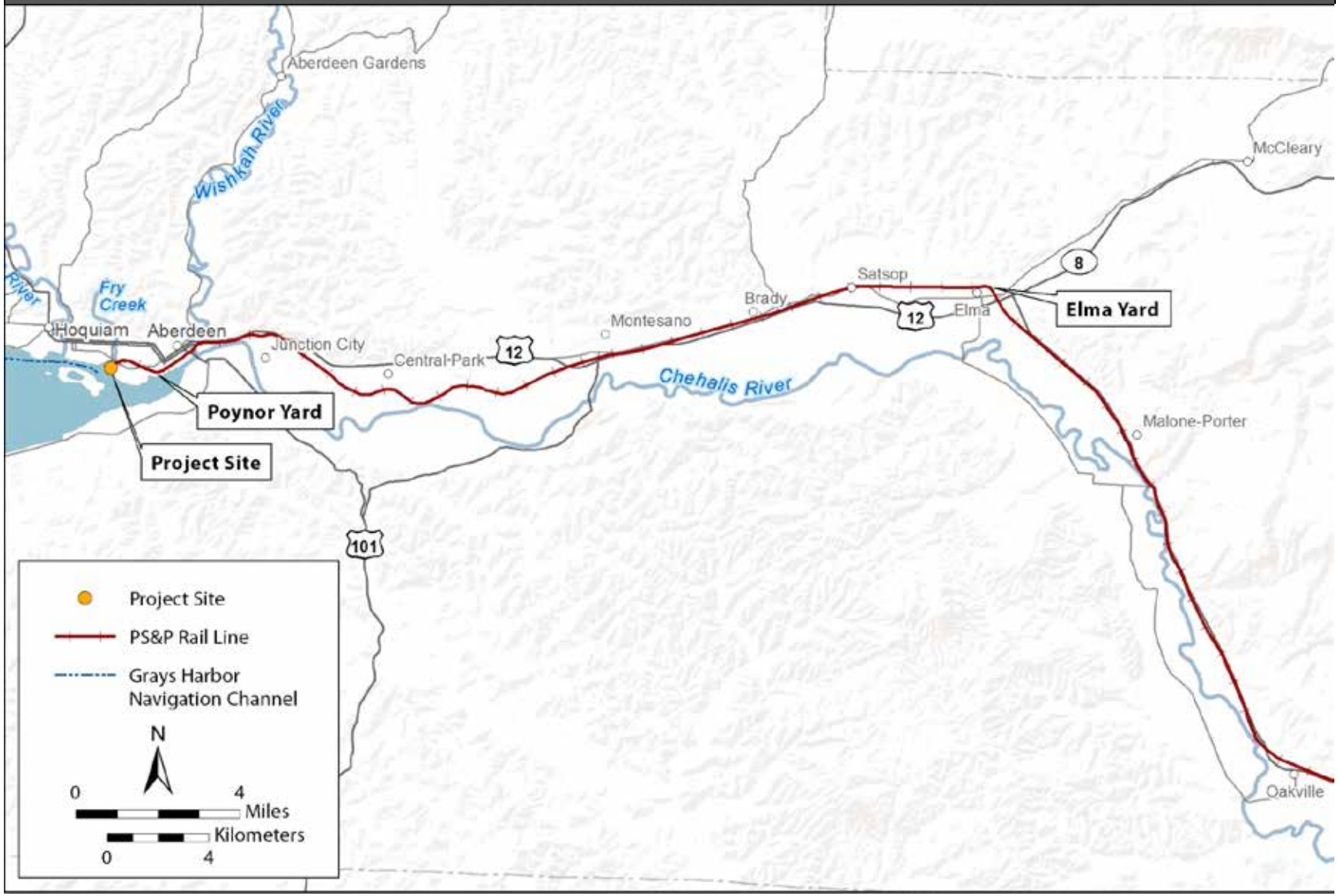


Figure 3.15-3. PS&P Rail Line General Route (West)



3.15.2 What laws and regulations apply to rail traffic?

Laws and regulations for determining potential impacts on rail traffic are summarized in Table 3.15-1. More information about these laws and regulations is provided in Appendix B, *Laws and Regulations.* Policies related to the transport of crude oil by rail are addressed in Chapter 4, *Environmental Health and Safety*.

Table 3.15-1. Laws and Regulations for Rail Traffic

Laws and Regulations	Description
Federal	
Interstate Commerce Commission Termination Act (49 U.S.C. 101)	Re-establishes the Surface Transportation Board and upholds the common carrier obligations of railroads; requires railroads to provide service upon reasonable request.
Federal Railroad Administration Regulations (49 CFR 200–299)	Establishes railroad regulations, including safety requirements related to track, operations, and cars.
Pipeline and Hazardous Materials Safety Administration (49 CFR 105-110, 130, and 171-180)	Regulates the movement of hazardous materials.
Enhanced Tank Car Standards and Operational Controls for High-Hazard Flammable Trains (80 FR 26643)	The Final Rule, passed May 8, 2015, defines and regulates the operations of "high-hazard flammable trains."
State	
Title 81, Transportation – Railroads, Crossings (RCW 81.53)	Establishes requirements and process for railroad construction and extensions that would cross any existing railroad or highway at grade. Includes approval from the commission.
WSDOT Local Agency Guidelines M 36-63.28, June 2015, Chapter 32, Railroad/Highway Crossing Program	Focuses on adding protection that improves safety and efficiency of railroad/highway crossings. Provides a process for investigating alternatives for improving grade-crossing safety. Alternatives include closure, consolidation, and installation of warning devices.
WSDOT Design Manual M 22.01.10, July 2013, Chapter 1350, Railroad Grade Crossings	Provides specific guidance for the design of at-grade railroad crossings.
Rail Companies—Operation (WAC 480-62)	Establishes operating procedures for railroad companies operating in Washington State. Includes general and procedural rules, safety rules, reporting requirement rules, and the establishment and distribution of a grade-crossing protective fund.
Local	
No local laws or regulations apply to rail traffic.	

[a] Although states have limited regulatory authority over railroads, per agreements with FRA, WUTC inspects and issues violations for hazardous materials, track, signal and train control, and rail operations. WUTC also regulates the construction, closure, or modification of public railroad crossings. In addition, WUTC inspects and issues defect notices if a crossing does not meet minimum standards. However, WUTC has no jurisdiction over public crossings in first class cities, including the City of Aberdeen. State rail safety inspectors are trained by FRA via an agreement that allows the state to enforce FRA regulations. WUTC and WSDOT also play other roles in the planning and oversight of railroads in Washington State.

U.S.C. = United States Code; CFR = Code of Federal Regulations; FRA = Federal Railroad Administration; WUTC = Washington Utilities and Transportation Commission; WSDOT = Washington State Department of Transportation; RCW = Revised Code of Washington; WAC = Washington Administrative Code

3.15.3 How were impacts on rail traffic evaluated?

This section describes the sources of information and methods used to evaluate impacts.

3.15.3.1 Information Sources

Research and analysis for rail traffic entailed visiting sites along the PS&P rail line, interviewing PS&P staff, collecting and reviewing data, and conducting rail simulation modeling. Existing rail information was collected from state and federal agencies, the applicant, the Port of Grays Harbor (Port), and PS&P. Compiled data included the following items.

- Typical scheduled traffic
- Typical actual traffic
- Track geometry[4]
- Track construction
- Track right-of-way
- PS&P rail line crossing data (referred to as grade crossings)

Recently prepared agency studies provided a foundation for the rail traffic analysis. The following studies were used for this analysis.

- *Washington State 2014 Marine & Rail Oil Transportation Study* (Washington State Department of Ecology 2014, 2015)
- *Washington State Rail Plan, Integrated Freight and Passenger Rail Plan, 2013–2015* (Washington State Department of Transportation 2014a)
- *Washington State Freight Mobility Plan* (Washington State Department of Transportation 2014b)

During fall 2014, project sites and tours of the PS&P rail line were conducted via hi-rail.[5] Where feasible, physical tracks were inspected and current rail operations were observed.

3.15.3.2 Impact Analysis

Rail traffic data were compiled and analyzed per the following five steps.

1. Reviewed and compiled relevant rail characteristics. Elements included current physical track arrangement, traffic, speed and time, signals, traffic control, and grade crossings.
2. Held discussions with PS&P staff to determine planned future maintenance and operating improvements along the rail line.
3. Used a simulation model with basic manual stringlines[6] to analyze current scheduled traffic and typical traffic patterns. The stringlines are provided in Section K.2 of Appendix K, *Rail Traffic Technical Information*.
4. Modeled future traffic patterns with and without the proposed action for 2017 and 2037 and used the simulation to determine PS&P's ability to support new and/or additional freight

[4] Track geometry refers to layout, design, and curvature of the rail line.
[5] Hi-rail is a road-rail vehicle that can operate both on rail tracks and a roadway.
[6] A stringline analysis is a graphic representation of the movement of trains on a rail line.

service. Planned PS&P rail line improvements for 2037 were incorporated into the model to identify differences in rail operations and delays with and without the improvements. The methods for completing the modeling are described below.

5. Identified physical and operational improvements that may be necessary for new service, as appropriate.

Rail Simulation Modeling

A typical approach to determining the ability of a rail line to support future rail traffic is to perform a simulation model. The simulation was completed to verify PS&P's ability to support additional trains (in each direction) and to determine any potential impacts on overall rail traffic and environmental and community resources. In addition, this simulation and analysis consider whether physical and operational improvements may be necessary to accommodate additional trains anticipated in relation to the proposed action.

The initial step of the simulation entailed a train performance calculator, which calculates the propulsive (e.g., gravity, locomotive power) and resistive (e.g., brakes, gravity, air resistance, friction) forces acting on the train at 1-second intervals. The calculation includes the effect of infrastructure on rail traffic (e.g., speed limits) by simulating the actions of the engineer controlling the train.

The train performance calculator input data include the following elements.

- Locomotive characteristics (e.g., horsepower, tractive effort, fuel consumption per hour per throttle position).
- Train characteristics (number of loaded and empty cars, weight of the cars when empty, weight of the train including lading, length, cross section in square feet, an air resistance factor based upon car type).
- Track characteristics (to the nearest 0.01 mile: turnouts, grade crossings, grade and change in grade, speed limits).

The simulation follows the location of current and future trains minute-by-minute along a specific segment of the PS&P rail line. The simulation included the following steps.

- Representing the existing track configuration. Planned Port and PS&P track improvements were also included in the simulation for the 2037 analysis (Gomez pers. comm.).
- Locating (minute-by-minute) every train entering and leaving the area (current trains and anticipated future trains).
- Determining the conflicts between trains as they use the tracks and associated facilities.
- Determining the conflicts that could be solved by changing the time certain trains operate, as well as by determining if the time could be changed for trains related to the proposed action (trains have various schedule and maintenance requirements that need to be met).
- Determining the additional track and facilities needed to accommodate future train traffic.

Three scenarios were run.

- 2017 no action included existing infrastructure.

- 2037 no action included PS&P-identified rail infrastructure improvement projects designed to improve operating efficiency along the PS&P rail line if rail traffic increased up to 10 trains per day[7] (Gomez pers. comm.). These projects are currently not funded or programmed for implementation.
  - Extension of one track at Blakeslee Junction to 8,100 feet.
  - Addition of a siding immediately east of Montesano.
  - Addition of a siding at a place yet to be determined, but probably immediately east (south) of Elma.
  - Improvements to Wishkah River bridge to allow increase in speeds from 10 miles per hour (mph) to 25 mph.
- 2037 proposed action included the 2037 no action baseline with the addition of the proposed rail traffic.

In addition to providing information regarding the operations of current and future rail traffic along the PS&P, the simulation model and analysis provided the foundation for the impacts analysis related to fuel consumption, grade-crossing occupancy and vehicle traffic delay, noise and vibration, and diesel emissions. Discussion of these topics is provided in Section 3.2, *Air Quality*, Section 3.6, *Energy and Natural Resources*, Section 3.7, *Noise and Vibration*, and Section 3.16, *Vehicle Traffic and Safety*. The potential impacts related to rail safety are discussed in Chapter 4, *Environmental Health and Safety*.

3.15.4 What rail traffic is in the study area?

This section describes rail traffic in the study area that could be affected by construction and routine operation of the proposed action.

The PS&P rail line is the sole rail connection to the project site and Hoquiam and Aberdeen. The rail line extends from Hoquiam to Centralia, where it connects with the BNSF main line. As a common carrier, PS&P is exclusively regulated by the federal government.

3.15.4.1 Rail Service between Centralia and Hoquiam

The PS&P rail line between Centralia and Hoquiam was constructed from 1889 through 1896. The original segment was constructed by the Puget Sound & Grays Harbor Railroad, then purchased and completed between Centralia and Hoquiam by Northern Pacific Railway.[8] Headquartered in Connecticut, Genesee & Wyoming, Inc., is the current owner of PS&P.

AS defined by the Surface Transportation Board, PS&P is considered a Class III railroad based on its annual revenue of less than $34.7 million. PS&P is also categorized as a short-line railroad, as defined by the Association of American Railroads because it is less than 350 miles long with an annual revenue under $40 million.

[7] Although these projects are currently not funded or programmed for implementation, they were included in the simulation modeling for 2037 to determine if they would contribute to rail operational efficiency and decrease delay at grade crossings in the future.

[8] In 1970, Northern Pacific merged with the Burlington Northern Railroad (now the BNSF Railway Company). In 1997, the line was sold to Puget Sound & Pacific Railroad (PS&P), a subsidiary of ParkSierra Railgroup. In 2002, ParkSierra Railgroup was purchased by RailAmerica, which was purchased by Genesee & Wyoming, Inc. in 2012.

PS&P Subdivisions

The PS&P rail line serves 30 industries, including current activities at the project site. It provides a connection to the Naval Base Kitsap, brings unit trains of automobiles and grain to Grays Harbor for export on ships, and removes municipal solid waste from Kitsap County twice per week. PS&P owns and operates the line between Centralia and Hoquiam (Elma Subdivision) and the line between Elma and Shelton (Shelton Subdivision). PS&P also operates the U.S. Navy-owned line between Shelton and the Bangor Base (Bangor Subdivision) with a short segment between Bremerton Junction and Bremerton (Bremerton Subdivision). This portion of the line is designated as part of the Strategic Rail Corridor Network and, as such, must be maintained at levels dictated by the U.S. military to support current and potential defense mobilization demands (WorleyParsons 2014).

Table 3.15-2 provides an overview of PS&P subdivisions, areas it serves, and commodities and products it transports.

Table 3.15-2. PS&P Railroad Subdivisions

Subdivision[a]	PS&P Rail Mileposts	Length (miles)	Location	Description
Elma	0.0–75.2[b]	59	Centralia (Blakeslee Junction) to Hoquiam	Main line owned and operated by PS&P, serves the industries of the Port and the project site. Commodities include grain, soybean, soda ash, automobiles, garbage, military trains, and bulk liquids.
Shelton	48.7–25.2	26	Elma to Shelton	Owned and operated by PS&P, commodities include lumber, garbage, and propane gas.
Bangor	25.2–42.8	48	Shelton to Bangor Base	Owned by the U.S. Navy, operated by PS&P. Same commodities as Shelton Subdivision plus military and other U.S. Government traffic from Naval Base Kitsap in Bremerton and Bangor Base.
Bremerton	0.0Z[c]–4.6Z	5	Bremerton Junction to Bremerton	Owned by the U.S. Navy, operated by PS&P. U.S. Government traffic from Naval Base Kitsap in Bremerton, and Bangor Base.

Source: WorleyParsons 2014

[a] The PS&P rail line is composed of four subdivisions. A subdivision is part of a larger section of a rail line (division), which is overseen by a superintendent.

[b] The milepost numbering skips a section from milepost 13.3 to 29.8, resulting in the physical track miles being less than the notated signage. The current end of track is at milepost 74.2.

[c] Milepost 32.1 on Bangor Subdivision.

3.15.4.2 PS&P Rail Line Track Conditions and Physical Characteristics

A railroad is a fixed guideway transportation system. Unlike motor vehicles, trains must follow a track and can only change "lanes," turn, enter, or leave the route when a track has been specifically constructed for that purpose. Managing rail operations and identifying infrastructure needs involves determining exactly where trains need to enter and leave the route, change tracks, and turn onto another route. Physical rail characteristics must be considered when evaluating current and future rail traffic and a rail line's capacity. Appendix K, Section K.1 *Rail Traffic Technical Information*,

provides an explanation of these terms, as well as other railroad terminology used throughout this section. The following discussion describes characteristics of the PS&P rail line.

Main Line Track and Sidings

The PS&P rail main line extends between rail milepost (MP) 0.00 at Centralia and 70.0 at the Port of Grays Harbor. The track extends beyond Hoquiam at MP 74.2 (Figures 3.15-2 and 3.15-3).[9]

The entire line between Centralia and Hoquiam is single track. On a single-track line, segments of second track (sidings) must be located periodically along the line to allow trains to pass each other (passing or meeting). To be functional, a siding must be able to accommodate a complete train, allowing the main track to be used by the passing or meeting train. There is only one siding between Centralia and Aberdeen, at Cedar Creek, about 4 miles west of Oakville. The yard at Blakeslee Junction, located in Centralia, can also serve as a siding.

The running time between sidings defines the capacity of the line. For example, if the longest running time between meeting points is 1 hour, the line can typically accommodate one train per hour when traffic is arranged with operation in alternating directions.

Curves and Grades

The PS&P rail line is relatively flat and straight. The route contains four 6-degree[10] curves and 13 4-degree curves. All other curves are approximately 3 degrees or less. All of the grades are quite short in length at around 0.1 or 0.2 mile. The steepest grade along the line is approximately 1% in eight locations. The speed limits are less than the limit on operating speed that would be imposed by track geometry or grades.

Rail Bridges

The PS&P line between the BNSF main line in Centralia (MP 0.0) and its terminus in Hoquiam (MP 72.6) has 55 rail bridges (including box culverts). There are 52 rail bridges (including box culverts) between Centralia and the project site. All bridges cross waterways (sloughs, rivers, creeks, or intermittent streams). The larger waterway crossings on the PS&P rail line are as follows.

- Skookumchuck River (MP 1.68)
- Black River (MP 12.64)
- Satsop River (MP 52.43)
- Wynoochee River (MP 59.00)
- Chehalis River (MP 66.25)
- Wishkah River (MP 68.24)

The speed limit across rail bridges is generally 25 mph for all trains except as noted in the next subsection.

[9] Due to different surveys during construction, the rail milepost at Gate is both MP 13.3 and MP 29.8. Mileposts from Gate continue based on the MP 29.8 designation.
[10] In railroad engineering, a degree changes take place over a 100-foot distance.

Federal Railroad Administration Class of Track and Speeds

The PS&P tracks are registered with the Federal Railroad Administration (FRA) as Class 2 tracks[11] with an overall maximum speed of 25 mph for freight trains.

The speed limit between Centralia and Poynor Yard in Aberdeen is generally 25 mph for all trains except as follows.

- Between Centralia and about 1.5 miles east of Grand Mound, the speed limit is 10 mph, and trains must be prepared to stop for other trains or obstructions within half the range of vision (yard limits operation). Depending on visibility, actual train speed may be substantially less than 10 mph. For example, structures on the inside of the curve between the connection with BNSF near Maple and B Streets in Centralia limit visibility. As a result, trains may move at 5 mph or less until extended visibility allows greater speed.
- Through a 4-mile segment in Elma, the speed limit is 25 mph, except for a 2,000-foot-long segment where the speed limit is 10 mph. Depending on visibility, trains may operate at substantially less than 10 mph.
- Over Devonshire Bridge (Wynoochee River), the speed limit is 10 mph. Current maintenance plans include repairing this bridge and increasing the speed limit to 25 mph.
- For about 1,000 feet at a point about 4 miles west of Montesano, the speed limit is 10 mph. The track is on the bank of the Chehalis River. The soil condition is such that maintenance to the tolerance required for 25 mph speed limit is difficult.
- Between approximately Junction City Road, east of Aberdeen, and the end of the line in Hoquiam, the speed limit is 10 mph. This area is within yard limits, so trains may move at a speed substantially less than the speed limit, depending upon visibility. This segment includes seven grade crossings along US Route 12 (US 12), east of the Wishkah River.
- Over the moveable bridges spanning the Wishkah and Hoquiam Rivers, the speed limit is 5 mph, in part because of the maintenance condition, but also because these are moveable bridges (drawbridges). The rails must separate to open the bridge and align again when the bridge is closed, which contributes to the speed limit of 5 mph.

3.15.4.3 Rail Yards

Three rail yards serve the PS&P rail line between Centralia and Hoquiam: Poynor Yard, Elma Yard, and Centralia/Blakeslee Junction Yard (Figures 3.15-2 and 3.15-3).

Poynor Yard

Poynor Yard is in Aberdeen along the Chehalis River between South H Street and South Washington Street. Cars from the industries in Hoquiam and Aberdeen are moved to Poynor Yard for mechanical inspection and air brake testing before being coupled with other cars (to form a train). The yard has five tracks, which, depending on the track, can hold 17 to 27 cars each. The main track between the ends of the yard can hold 40 cars.

[11] Class of track is defined in terms of rail tolerances, by 49 CFR 213. FRA has published the Track and Rail and *Infrastructure Integrity Compliance Manual, Volume II, Section 1 Track Safety Standards Classes 1 through 5* to provide explanation and commentary for these regulations.

Trains leaving Aberdeen traveling east typically have more cars than a single yard track can hold. It is necessary to couple cars located on multiple tracks to create one train. The process, called *doubling*, involves pulling the cars on a yard track out of the yard and onto the main line. The coupled cars on the main line are then backed against cars on another yard track. Depending on the desired length of the train, this process may be repeated up to five times. Doubling a train out of the yard in Aberdeen can take up to 50 minutes. During that time, the main line between Aberdeen and the siding at Cedar Creek is occupied and no trains can be run to Aberdeen from Cedar Creek or Elma.

Elma Yard

A small yard at Elma is used to store cars for industries on the Shelton Subdivision and to sort cars destined to or received from industries on the Shelton Subdivision.

Centralia Yard and Blakeslee Junction Yard

Centralia Yard and Blakeslee Junction Yard function as one yard. This yard receives cars destined to industries along the PS&P rail line from the BNSF main line and delivers cars from the industries to the BNSF main line. When cars are delivered to these locations, PS&P sorts the cars by destination, using the yard tracks for sorting. The destination may be a specific industry or another location that has several industrial customers. Cars for those locations, such as Aberdeen, are locally sorted by industrial customer and then delivered. When PS&P takes away the cars that the customer has released, they are brought to this yard, where they are sorted into cars for the BNSF main line.

3.15.4.4 PS&P Rail Line Connection with the BNSF Main Line in Centralia

At Centralia, trains moving to and from the PS&P rail line at 10 mph or less must separate from or merge with the flow of the BNSF through-traffic, which includes Union Pacific (UP) and Amtrak trains. Traffic on the BNSF main line through Centralia operates at a wide variety of speeds (Table 3.15-3).

Table 3.15-3. Typical Train Speeds along the BNSF Main Line through Centralia

Type of Train	Typical Speed through Centralia
PS&P train entering or merging the BNSF main line	Less than 10 mph
Amtrak	Up to 79 mph
Bulk commodity (e.g. grain trains)	30 to 45 mph
Other type of freight trains	30 to 60 mph

BNSF = BNSF Railway Company; PS&P = Puget Sound & Pacific Railroad; mph = miles per hour

The typical speeds cited above represent train movement along the BNSF main line; however, Amtrak trains slow down considerably and stop at the Amtrak station in Centralia; they are not traveling at 79 mph once they near the train station, which is approximately 0.5 mile south of the PS&P rail line and BNSF main line junction. In addition, some freight trains stop at Centralia to deliver cars to or pick up cars from the PS&P rail line, which also results in slower train speeds. These freight trains may be stopped at Centralia for as long as 1 hour, while the Amtrak trains are typically stopped at the Centralia station for 3 minutes.

3.15.4.5 Ongoing Maintenance and Inspections

PS&P maintains the line between Centralia and Aberdeen (Poynor Yard) to FRA Class 2 standards. The line is inspected electronically annually to find hidden defects. FRA does not regularly inspect rail bridges, including the bridges on the PS&P rail line. FRA bridge inspections are complaint- or record-based from the review of bridge records.

In addition to weekly inspections, PS&P continues to maintain and upgrade track. In 2014, PS&P performed the following upgrades.

- Installed 12,200 ties between MPs 0.60 and 5.0, 28.5 and 38.0, and 62.0 and 64.0.
- Relayed 7,840 feet of curve rail at MPs 1.8, 4.1, 41.5, 47.9, and 66.6.
- Made various bridge repairs at MPs 2.34, 12.64, 38.8, 46.9, 52.43, 63.93, and 68.64.

As is typical with all railroads, inspections and maintenance are ongoing. Replacement of ballast, ties, and rail continues as needed. Other improvements to maintain safety and speed are also typical of continued railroad maintenance, such as bridge upgrades and grade-crossing improvements.

Train and Rail Car Inspections

Railroad operating rules require all employees to conduct a visual inspection for defects (e.g., overheated bearings, sticking brakes, sliding wheels, wheels not properly positioned on the rail, dragging equipment, insecure contents, signs of smoke or fire, headlight or marker improperly displayed, any other dangerous condition) of every passing train they encounter. If any defect in the train is found, the employee sends a radio message to the train, which is then stopped for inspection by a crewmember. Cars that have a defect that a crewmember cannot repair are removed from the train and left for repairs. Trains operating on the PS&P rail line are also inspected at Poynor Yard.

FRA regulations require a complete mechanical inspection of each train before it leaves its initial station. Regulations also require mechanical inspections at intervals of 1,000 miles (1,500 miles under certain conditions). For trains traveling to Washington State along BNSF's Northwest and Montana Operating Divisions, an inspection would take place at Havre, Montana.

Electronic train defect detectors inspect passing trains for defects such as overheated bearings, broken wheels, dragging equipment, and other faults. When a defect is detected, the device transmits a message on the two-way radio communication channel. The train is then stopped for inspection by a crewmember. There is one electronic defect detector located on the PS&P rail line, near Oakville.

Future Maintenance Projects

PS&P has a capital improvement program, which includes a number of ongoing and periodic maintenance projects designed to maintain current capacity, safety, and operations. These projects address the normal wear and tear of a rail line, and will be needed as more trains (or more cars) transport commodities along the PS&P rail line. It is assumed that these maintenance projects, listed below, would occur within the 20-year analysis period (2017 to 2037).

- Install 9,500 new hardwood ties at various locations on the west end of the Elma Subdivision.
- Resurface approximately 15 miles of track.
- Upgrade three steel bridges.

- Upgrade five grade crossings in Aberdeen.
- Relay 90-pound rail at MP 72 and replace two turnouts in Hoquiam.
- Relay 11.2 miles of jointed 112-pound rail with continuous welded rail between Elma and Montesano.

3.15.4.6 Current Freight Rail Traffic

As stated previously, the PS&P rail line serves several industries and the U.S. military, which results in various rail traffic patterns between Centralia and Poynor Yard. Directional traffic along the PS&P rail line varies depending on customer and commodity. Current rail traffic on the PS&P rail line is described below by commodity.

- Automobiles (westbound) and empty automobile cars (eastbound).
- Grain (westbound) and empty grain cars (eastbound).
- Wood products (eastbound) and empty wood-product cars (westbound).
- Garbage (eastbound) and empty garbage cars (westbound).
- Chemicals and other liquids (both directions, typically to and from the project site, the site adjacent to the project site (Westway Terminal Company LLC), and Dow Chemical.
- Miscellaneous carload industrial material and products to and from a steel fabricator in Aberdeen, Port of Grays Harbor Warehouses.

Table 3.15-4 provides current rail traffic information. Virtually all of this traffic is loaded in specialized cars. The cars return empty for another load rather than being loaded with another commodity for the return trip.

Table 3.15-4. Current Rail Traffic by Commodity along the PS&P Rail Line

	Status by Direction		Typical Trips[a]			Typical Number of Cars per Train
Commodity	**West**	**East**	**Daily**	**Weekly**	**Annually**	
Auto	Full	Empty	0.5	3.8	197	65
Grain	Full	Empty	0.6	4.0	206	101
Mixed carload freight[b]	Varies	Varies	2.1	15.0	780	50
Between Centralia and Aberdeen	*Varies*	*Varies*	*1.6*	*11.5*	*598*	*50*
Between Centralia and Elma	*Varies*	*Varies*	*0.3*	*2.4*	*124*	*50*
Between Elma and Aberdeen	*Varies*	*Varies*	*0.2*	*1.1*	*58*	*50*
Garbage[d]	Empty	Full	0.1	1.0	52	98
Total			**3.1[c]** **3.0[d]**	**23.8**	**1,235**	

[a] A trip represents one-way travel. In other words, eastbound and westbound travel of a train is counted as two trips. The totals do not sum due to rounding.
[b] Includes various products and commodities including lumber and wood products, plastics, cement, frozen foods, bulk liquids, and chemicals. Depending upon the customer and product, full train and empty train travel directions vary.
[c] West of Elma.
[d] East of Elma.

3.15.4.7 Current PS&P Rail Line Capacity and Operations

This section describes current PS&P rail line capacity and operations between Centralia and east Aberdeen and between east Aberdeen and the project site.

Between Centralia and East Aberdeen

Unlike passenger trains, freight trains do not run on a schedule. U.S. railroads evaluate each situation and dispatch trains based on a number of criteria, including available crew, number of cars, cost of fuel, and overall revenue. Analysis and projection of the effect of rail operations on a line's capacity requires analyzing the rail traffic and developing typical operations. Measurements, analysis, and projections are based on this hypothetical traffic plan.

Current PS&P rail traffic between Centralia and east Aberdeen is very light. In October 2014, PS&P provided a table of typical traffic for November 2013. The table was transformed into a stringline diagram, the graphical format universal to railroad operation. The stringline is a time-distance graph of train movements. From it, the relationship of trains to infrastructure and to each other becomes visible, and current and future rail capacity can be determined.

As presented in Section 3.15.3.2, *Impact Analysis, Rail Simulation Modeling*, the train performance calculator was used to simulate individual train movement along the rail line to provide a basis to measure changes over time. To do so required considering each type of train (e.g., grain, auto, carload freight, and local freight) for the sample period and determining the number of cars composing a typical train. Train size and makeup of loaded and empty cars varies substantially; therefore, existing data were used to determine typical train type and features. Additional analysis of the traffic by train type, capacity of the tracks, and the total of number of cars as trains left and arrived, resulted in a year of typical eastbound and westbound traffic. The number of trains is not the same in both directions because of varying train length.

Once the modeling and analysis were completed, daily individual trips[12] were combined to create stringlines for the entire line. Stringline diagrams are provided in Section K.2 of Appendix K, *Rail Traffic Technical Information*. The stringline diagrams show that traffic is substantially less than capacity. The analysis indicates that the PS&P rail line has the theoretical capacity to handle up to 12 train trips per day.

As shown in Table 3.15-4, current rail traffic along the PS&P rail line consists of an average of 3trips per day. However, trains take longer to make the trip than would be expected from a nonstop trip. The diagrams show conflicts where two trains would occupy a segment of track at the same time had the dispatcher not intervened. In these cases, one train would wait for the other unless their paths happened to cross at a location where they could pass each other (Blakeslee Junction, Cedar Creek siding, or if one train was originating or terminating on the line between Elma and Shelton).

The following operations information was determined based on an analysis of individual trains and typical traffic.

- Westbound trains sometimes wait between Centralia and Aberdeen for accommodation at Aberdeen.

[12] A trip represents one-way travel; in other words, an inbound trip and an outbound trip are counted as two trips.

- Eastbound trains going through Centralia on the BNSF main line sometimes wait west of Centralia until the BNSF crew arrives or for an opening in the flow of the BNSF and Amtrak traffic at Centralia, so that roadways are not blocked in Centralia while the train is waiting.
- Eastbound trains that terminate at the yards in Centralia sometimes wait west of Centralia for accommodation.
- Some trains leave en route cars that cannot be accommodated at the destination to be picked up by a subsequent train.

In summary, although trains may need to wait at either end of the PS&P rail line in Centralia or Aberdeen, there is mainline capacity to handle up to 12 trips per day. Therefore, capacity limitations on the PS&P rail line are not related to mainline deficiencies between Centralia and Aberdeen but to the lack of sufficient space for cars (e.g., sidings, yards) to break down and deliver cars to customers at both ends of the PS&P rail line in Centralia and Aberdeen. Capacity and operations between east Aberdeen and the project site are discussed in the next section.

Grade-crossing occupancy depends on the number of rail cars and train speed at the crossing. On average, each train transit occupies grade crossings between Centralia and east Aberdeen for between approximately 3 and 8 minutes (Table 3.15-4 illustrates the frequency of train transits). Appendix L, *Vehicle Modeling* provides the average daily occupancy time at all grade crossings.

Between East Aberdeen and the Project Site

PS&P rail line capacity is more constrained between east Aberdeen and the project site than between Centralia and east Aberdeen. Poynor Yard and adjacent track to the yard in Aberdeen have limited capacity for moving a locomotive (train engine) from one end of a train to the other (running around). Switching movements, including breaking down unit trains to deliver to industries in the Port area, require pushing multiple cars extracted from arriving trains a long distance over one or more grade crossings west of Poynor Yard. Switching movements from the buildup of trains at Poynor Yard also occupy grade crossings east of Poynor Yard, all the way to South Fleet Street in east Aberdeen for some trains. Yard operations also require movement at restricted speed, and it is often necessary to stop and have a crewmember get off the train and stand in the roadway to flag traffic before the train can proceed. Thus, extended occupancy times at the grade crossings between east Aberdeen and the project site are common.

Like mainline operations, yard operations are developed based on operational needs. Each day, the conductor of the train assigned to yard switching determines, from a list of work to be done (e.g., cars to move from the yard to an industry, cars to remove from an industry, cars to move from one place to another within an industry) how to perform the work. Appendix K, *Rail Traffic Technical Information*, provides information on the basics of rail operations and characteristics.

Using train performance calculator data and a detailed itinerary of a typical switching operation, a model of track and grade crossing occupancy was developed to characterize the existing condition. The following description represents typical rail operations east and west of Poynor Yard.

East of Poynor Yard

Due to the limited track lengths in the Poynor Yard, long trains leaving Aberdeen traveling east on the PS&P rail line are assembled in the Poynor Yard from short segments. The yard has five tracks that can hold 17 to 27 cars each. Trains leaving Aberdeen traveling east typically have more cars

than one yard track can hold, and cars must be doubled, as described in Section 3.15.4.3, *Rail Yards, Poynor Yard*. Section K.5 of Appendix K, *Rail Traffic Technical Information*, provides illustrations of the doubling process.

Doubling a train out of the yard can take up to 50 minutes and no westbound train can run into Aberdeen during this time. For each track of cars added to an eastbound train, cars attached to the engine are pulled to the east beyond the switch to allow the next track of cars to be added to the train. This train-building process can result in the grade crossings east of the Poynor Yard, including the grade crossings in east Aberdeen (Olympic Gateway Plaza area), being occupied. Table 3.15-5 illustrates existing grade crossing occupancy times for a single train transit by train type at the crossings closest to Poynor Yard (East Heron Street) and the crossing furthest from the yard (Fleet Street) in the Olympic Gateway Plaza area. Figure 3.15-4 illustrates the PS&P rail line east of Poynor Yard.

Table 3.15-5. Grade Crossing Occupancy Times[a] in East Aberdeen at Selected Crossings by Train Type and Direction for Each Train Transit

	Eastbound Trains		Westbound Trains	
Train Type[b]	**East Heron Street**	**Fleet Street**	**East Heron Street**	**Fleet Street**
Grain	44 minutes	37 minutes	11 minutes	9 minutes
Auto	43 minutes	36 minutes	12 minutes	10 minutes
Mixed carload freight (68 cars)	34 minutes	17 minutes	9 minutes	6 minutes
Mixed carload freight (37 cars)	16 minutes	14 minutes	9 minutes	6 minutes

[a] Occupancy times rounded to the nearest minute.
[b] See Table 3.15-4 for the frequency of these train types.

The grade-crossing occupancy times for eastbound grain and auto trains (each average 0.25 train per day) are between 36 and 44 minutes; the times are between 17 and 34 minutes for mixed carload freight trains. The grade-crossing occupancy times for all westbound trains are between 6 and 12 minutes. East Heron Street has the highest crossing occupancy times because it is the closest crossing in east Aberdeen to Poynor Yard.

The grade-crossing occupancy times in Table 3.15-5 are for each train transit. As shown in Table 3.15-4, the typical number of existing daily trips is 3.1 for all trains. Using the typical number of trips per day for each train type (0.6 grain train trip, 0.5 auto train trip, and 2.1 mixed carload freight train trips), the total daily average crossing occupancy time for all trains is 1 hour 10 minutes at East Heron Street and 49 minutes at Fleet Street. The frequency of these trains by week and year is shown in Table 3.15-4.

Figure 3.15-4. PS&P Rail Line Grade Crossings East of Poynor Yard

West of Poynor Yard

Rail operations west of Poynor Yard include trains moving directly between industrial facilities and Poynor Yard, and switching operations, which move rail cars among tracks in an industrial facility during the process of sorting cars or placing them in the required location for loading or unloading. Figure 3.15-5 illustrates the grade crossings west of Poynor Yard.

Figure 3.15-5. PS&P Rail Line Grade Crossings West of Poynor Yard

Any time an eastbound or westbound grain, auto, or mixed carload freight train is moved directly between Poynor Yard and industrial facilities west of Poynor Yard, the train occupies grade crossings between 3 and 9 minutes, depending on the train type and location (Table 3.15-6).

Table 3.15-6. Grade-Crossing Occupancy Times in East Aberdeen at Selected Crossings by Train Type and Direction for Each Train Transit[a]

	Eastbound Trains		Westbound Trains	
Train Type[b]	**West 1st Street**	**Port Industrial Road**	**West 1st Street**	**Port Industrial Road**
Grain	9 minutes	9 minutes	N/A[c]	8 minutes
Auto	8 minutes	8 minutes	N/A[c]	7 minutes

[a] Occupancy times rounded to the nearest minute.
[b] See Table 3.15-4 for the frequency of these train types. Mixed carload freight trains do not occupy these crossings.
[c] Not applicable. Train does not occupy crossing.

Switching operations, described below, between industrial facilities west of Poynor Yard (project site and Westway Terminal Company LLC site) occupy the grade crossings west of Poynor Yard. The maximum grade-crossing occupancy times are between 3 and 13 minutes from switching operations (Table 3.15-7).

Table 3.15-7. Grade-Crossing Occupancy Times West of Poynor Yard from Switching Operations at Selected Crossings[a]

Grade Crossing	Applicant	Westway Terminal Company LLC
Port Industrial Road	3 minutes	5 minutes
West 1st Street	4 minutes	7 minutes
Industrial Road	13 minutes	9 minutes

[a] Occupancy times rounded to the nearest minute.

On a typical day, the applicant receives 12 cars and releases 12 cars. These cars are separated from other cars of an incoming mixed carload freight train in the Poynor Yard then moved by a switching locomotive to the project site for unloading. This process typically results in one to two trips onto and off the project site each day, to deliver and remove an average of 12 cars. Because the applicant handles several commodities, it is often necessary to remove cars individually from several tracks, switch released cars from a string of cars on a track and return the others, and place received cars onto several tracks. These movements occupy the Myrtle Street, West 1st Street, South Maple Street, and Industrial Road crossings as shown in Table 3.15-7. In addition, the adjacent industrial site (Westway Terminal Company LLC) releases cars and receives cars that occupy grade crossings.

The grade-crossing occupancy times in Tables 3.15-6 and 3.15-7 are the grade-crossing occupancy times. Including all trains (grain, auto, and mixed carload freight trains) and switching operations (delivery of rail cars to and from the project site and adjacent site), the average daily grade-crossing occupancy time is 14 minutes at Port Industrial Road, 17 minutes at West 1st Street, and 43 minutes at Industrial Road. This means that on average, trains occupy the Port Industrial Road crossing for approximately 14 minutes each day.

3.15.4.8 Running Time between Centralia and Poynor Yard in Aberdeen

PS&P trains between the BNSF main line in Centralia and the Poynor Yard in Aberdeen during a 30-day sample period had the following average running times.

- The aggregate average nonstop running time for all trains was 2 hours 43 minutes.
- The average running time for all trains was 6 hours 3 minutes (includes stopping time).
- The longest running time was 22 hours 53 minutes.

The variances in running times are a direct result of the operational constraints identified in Section 3.15.4.7, *Current PS&P Capacity and Operations*. The capacity limitation on the PS&P line is not related to mainline deficiencies between Centralia and Aberdeen, but rather the lack of sufficient space for cars (e.g., sidings, yards) to break down and deliver cars to customers at these locations. Detailed information related to these running times can be found in the stringlines and accompanying data tables in Section K.2 of Appendix K, *Rail Traffic Technical Information*.

3.15.5 What are the potential impacts on rail traffic?

This section describes impacts on rail traffic that could occur in the study area. Potential impacts of the no-action alternative are described first as a baseline for comparing the potential impacts of the proposed action.

3.15.5.1 No-Action Alternative

Under the no-action alternative, the applicant would continue to operate its existing facility as described in Chapter 2, *Proposed Action and Alternatives*. Although the proposed action and related rail traffic would not occur, it is assumed that growth in the region would continue under the no-action alternative, which could lead to development of another industrial use at the project site within the 20-year analysis period (2017 to 2037). However, the Washington State Department of Transportation Freight Mobility Plan (2014b:75–76) projects zero growth in the number of trains along the PS&P rail line over the next 20 years.[13] Increased rail traffic, if any, would likely be in the form of additional cars in a typical train and not in the form of additional entire trains. Potential impacts on rail capacity (unrelated to the proposed action) are discussed below.

With no projected growth in freight rail traffic, rail traffic would remain the same as existing conditions, which are far below current capacity between Centralia and east Aberdeen. Rail traffic delays described in Section 3.15.4.7, *Current PS&P Capacity and Operations*, would continue under the no-action alternative. Implementation of the projects identified by PS&P (Section 3.15.3.2, *Impact Analysis, Rail Simulation Modeling*) would theoretically increase mainline capacity between Centralia and Poynor Yard. However, because rail traffic is currently substantially less than the capacity of the line (between but not including Centralia and Poynor Yard), the sidings would increase efficiency by reducing rail traffic delay and making rail operations more flexible.

Existing capacity constraints associated with rail operations at and near Poynor Yard would continue under the no-action alternative. Although improvements would provide for additional flexibility and alleviate, to some degree, the duration of occupied grade crossings, existing rail traffic would continue to result in occupying grade crossings in the Port of Grays Harbor and east Aberdeen areas, as described in Section 3.15.4.7, *Current PS&P Capacity and Operations*. Vehicle delays at grade crossings would continue under the no-action alternative, as discussed in Section 3.16, *Vehicle Traffic and Safety*.

3.15.5.2 Proposed Action

This section describes the impacts that could occur in the study area as a result of construction and routine operation of the proposed action.

Construction

Construction of the proposed action would not modify existing PS&P rail line facilities and would have no impact on rail traffic.

Operation

Operation of the proposed action at maximum throughput would result in approximately 730 unit train trips per year, or approximately two trips per day on average. Table 3-15-8 summarizes trips under the proposed action. The trips identified in Table 3.15-8 are used to assess potential impacts of the proposed action; therefore, the discussion of potential impacts assumes the maximum annual throughput.

[13] The rail traffic projections in the Freight Mobility Plan do not include the proposed action and the reasonably foreseeable future actions identified in Table 6.4-1 in Chapter 6, *Cumulative Impacts*, which would add new rail traffic to the PS&P rail line.

Table 3.15-8. Unit Train[a] Trips[b] at Maximum Throughput—Proposed Action

Average Daily	Average Weekly	Maximum Annual
2.0	14.0	730

[a] Assumes 120-car unit trains (1.25 miles in length).
[b] Trips represent one-way travel; an eastbound trip and a westbound trip would be counted as two trips.

The following sections describe impacts of the proposed action on PS&P rail line capacity and operations between Centralia and east Aberdeen, and between east Aberdeen and the project site.

Rail Capacity and Operation between Centralia and East Aberdeen

As discussed previously, stringline and train performance calculator analyses indicate that the PS&P rail line has the theoretical capacity to handle up to 12 trips per day. Adding the approximately two unit train trips per day on average under the proposed action to the projected 3.1 trips under the no-action alternative (same as existing conditions, Table 3-15.4), the rail line would have capacity for an additional 6.9 trips per day. PS&P's planned infrastructure projects described in Section 3.15.5.1, *No-Action Alternative, PS&P Capacity and Future Operations*, would increase the theoretical capacity of the line from 12 trains per day to 19 trains per day. The projects would reduce rail traffic delay because projected traffic on the rail line would be substantially below the capacity limit.

Train Occupancy Times at Grade Crossings

Increased rail trips along the PS&P rail line related to the proposed action would increase train occupancy times at grade crossings between Centralia and east Aberdeen. The far-right column of Table 3.15-9 lists the average daily grade-crossing occupancy time at selected crossings for all trains (grain, auto, mixed carload freight, and proposed action train trips) compared to the no-action alternative. These crossings are already in the top 10 in the rail corridor for average daily traffic and blocked crossings (the other crossings are located in Aberdeen). Because rail traffic is not projected to increase in the 20-year analysis period, other than that related to the proposed action, grade-crossing occupancy time would remain the same over the 20-year analysis period. Impacts of these blockages on vehicles and pedestrians are discussed in Section 3.16, *Vehicle Traffic and Safety*.

Table 3.15-9. Average Daily Grade-Crossing Occupancy Time [a] at Selected Crossings between Centralia and East Aberdeen—No-Action Alternative and Proposed Action

Grade Crossing	Milepost	Location	No-Action Alternative	Proposed Action[b]
Tower Street (State Route 507)	0.82	Centralia	26 minutes	46 minutes
Pearl Street (State Route 507)	0.89	Centralia	26 minutes	46 minutes
West Reynolds Street	2.14	Centralia	17 minutes	35 minutes
Old Highway 99 SW	6.07	Unincorporated Thurston County	8 minutes	19 minutes
Monte Elma Road	51.98	Satsop	7 minutes	15 minutes

[a] Occupancy times rounded to the nearest minute.
[b] Times include no-action and proposed action trains.

Rail Capacity and Operation between East Aberdeen and the Project Site

Current operations at the project site would continue under the proposed action. However, the addition of unit train delivery and release would increase the length of time needed to perform these operations, as described below.

Switching Operations Into and Out of the Project Site

Switching operations of trains into and out of the project site would be similar to existing operations. Appendix K, *Rail Traffic Technical Information*, Section K.3, *Proposed Switching Operations*, illustrates how these operations would occur. The process of delivering and releasing a 120-car unit train is summarized as follows.

Upon arrival, the train would proceed directly to the switch leading into the project site, near the intersection of West 1st Street and North Maple Street. The crew would cut the lead locomotive and buffer car off the train, pull the lead locomotive off the train, and park it for the duration of the delivery operation. The parking of the train would occupy the grade crossings between Poynor Yard and the project site. A second crewmember would board the distributed power unit, which would be disconnected from radio operation, and push the train onto the receiving tracks at the project site. The train would need to be doubled in five times before the entire train is delivered. As the train is delivered onto the project site, the grade crossings occupied from the train would clear between the Poynor Yard and the project site, with the grade crossings closest to Poynor Yard cleared first.

A crewmember would ride the leading car into the project site to the end of the track. This crewmember would control the movement by giving directions to the engineer by radio. When the leading end of the train reaches the desired position near the end of the track, the movement would be stopped. The crewmember would walk back to the east end of the track, apply hand brakes to the cars, uncouple the remaining train, and instruct the engineer to back up (east) until the train has cleared the next delivery track. The crewmember would align the switches for the next track, board the leading end of the train, and repeat the procedure. The full procedure of pushing cars onto a track, uncoupling, backing out, and pushing again would be repeated five times after the initial push into the project site. When the entire train has been delivered, the crew would couple the

distributed power unit and rear buffer car to the lead locomotive and buffer car and return to Poynor Yard.

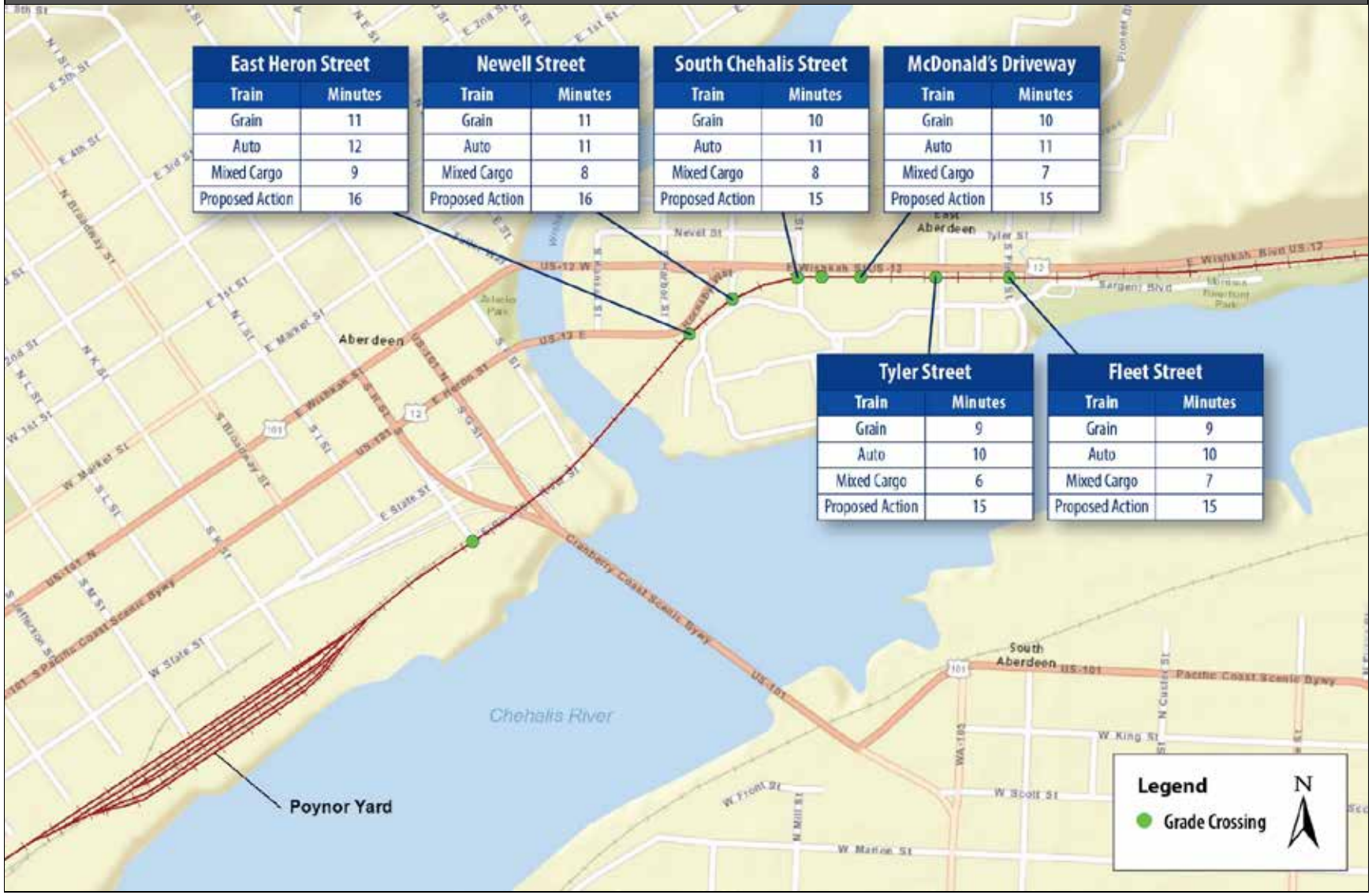
When the cars are released to return empty, they would be moved to Poynor Yard for mechanical and air brake inspection before being assembled into a train and returned to BNSF. A crewmember would run a locomotive from Poynor Yard to the project site, couple to 20 cars in a track, add another 20 cars in an adjacent track, pull them to Poynor Yard, and double them into the yard. This entire process would be repeated two more times. The empty cars would be given a mechanical and air brake inspection in Poynor Yard, then the distributed power unit and buffer car would be coupled to the west end of a track of about 20 cars. The leading locomotive and buffer car would be coupled to the east end of about 20 cars in another track. The train would then be doubled several times until the entire 120 cars are coupled and the air brakes are connected. The process is time-consuming. The grade crossings east of Poynor Yard would be blocked for an extended period as described below. Section K.4 of Appendix K, *Rail Traffic Technical Information*, illustrates the operation in use to inspect empty trains at Poynor Yard prior to their movement onto the rail line and eventually onto the BNSF main line.

The method described above to deliver cars to the project site and return cars from the project site would be the most time-efficient and cost-efficient approach. An alternative method would be for the arriving unit train to stop at Poynor Yard and deliver cars to the project site, similar to operations for existing conditions. While this method would reduce train occupancy times at grade crossings between Poynor Yard and the project site compared to the method described previously, it would not be the most cost-efficient and time-efficient approach, and could affect the capacity for other customers' cars. For this reason, the method described above is assumed in the following analysis of train occupancy times at grade crossings between Poynor Yard and the project site.

Train Occupancy Times at Grade Crossings

Proposed action unit trains would contain 120 cars; these trains are longer than existing trains serving the project site and would therefore increase train occupancy times at grade crossings between east Aberdeen (Olympic Gateway Plaza area) and the project site. Figures 3.15-6 and 3.15-7 illustrate westbound and eastbound occupancy times by train type in east Aberdeen. Table 3.15-10 illustrates the maximum occupancy times for the proposed action and no-action alternative trains at selected grade crossings.

Figure 3.15-6. Westbound Train Occupancy Times by Train Type at Selected Grade Crossings East of Poynor Yard



East Heron Street	
Train	Minutes
Grain	11
Auto	12
Mixed Cargo	9
Proposed Action	16

Newell Street	
Train	Minutes
Grain	11
Auto	11
Mixed Cargo	8
Proposed Action	16

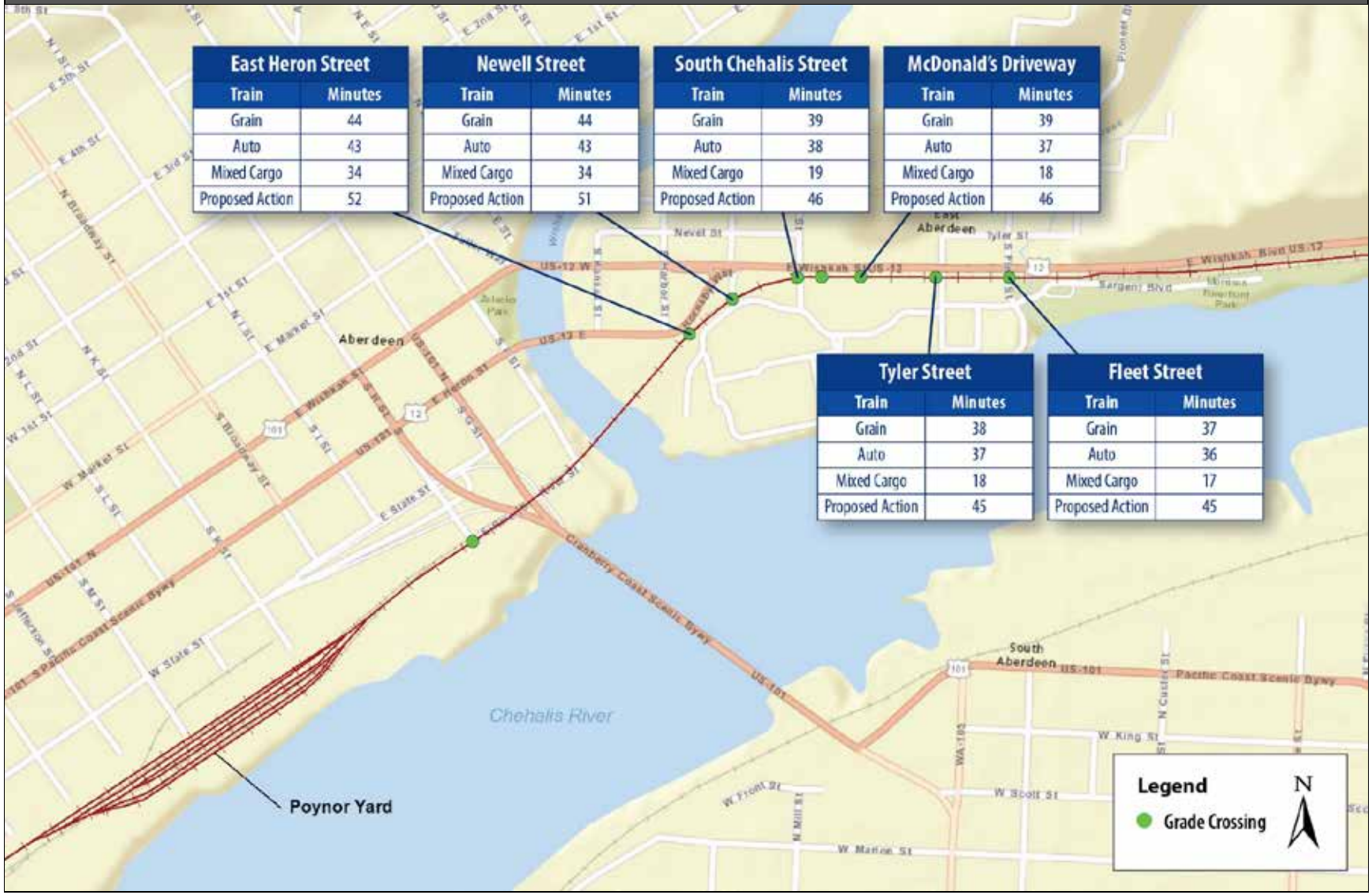
South Chehalis Street	
Train	Minutes
Grain	10
Auto	11
Mixed Cargo	8
Proposed Action	15

McDonald's Driveway	
Train	Minutes
Grain	10
Auto	11
Mixed Cargo	7
Proposed Action	15

Tyler Street	
Train	Minutes
Grain	9
Auto	10
Mixed Cargo	6
Proposed Action	15

Fleet Street	
Train	Minutes
Grain	9
Auto	10
Mixed Cargo	7
Proposed Action	15

Figure 3.15-7. Eastbound Train Occupancy Times by Train Type at Selected Grade Crossings East of Poynor Yard



East Heron Street	
Train	Minutes
Grain	44
Auto	43
Mixed Cargo	34
Proposed Action	52

Newell Street	
Train	Minutes
Grain	44
Auto	43
Mixed Cargo	34
Proposed Action	51

South Chehalis Street	
Train	Minutes
Grain	39
Auto	38
Mixed Cargo	19
Proposed Action	46

McDonald's Driveway	
Train	Minutes
Grain	39
Auto	37
Mixed Cargo	18
Proposed Action	46

Tyler Street	
Train	Minutes
Grain	38
Auto	37
Mixed Cargo	18
Proposed Action	45

Fleet Street	
Train	Minutes
Grain	37
Auto	36
Mixed Cargo	17
Proposed Action	45

Table 3.15-10. Maximum Occupancy Time[a] at Selected Grade Crossings—No-Action Alternative and Proposed Action

Grade Crossing	No-Action Alternative	Proposed Action[b]
Fleet Street	37 minutes	45 minutes
East Heron Street	44 minutes	52 minutes
Port Industrial Road	9 minutes	58 minutes
West 1st Street	7 minutes	1 hour 7 minutes
Industrial Road	13 minutes	1 hour 17 minutes

[a] Occupancy times rounded to the nearest minute.

Unit train trips under the proposed action would increase the maximum train occupancy times at all grade crossings in Aberdeen. For example, the maximum train occupancy time at East Heron Street would increase from 44 minutes to 52 minutes under the proposed action. The increase in occupancy times at the grade crossings east of Poynor Yard would be from switching operations to build up departing trains at and east of the Poynor Yard. The increase in train occupancy times at the grade crossings west of Poynor Yard would be from arriving trains and switching operations to break down trains at and west of Poynor Yard.

Unit train trips under the proposed action would also increase the frequency of trains occupying grade crossings in Aberdeen by approximately 14 times per week on average. All grade crossings in the Olympic Gateway Plaza area (from East Heron Street to Fleet Street) would be occupied for more than 35 minutes on average 3.9 times per week from eastbound grain and auto trains under the no-action alternative. Adding eastbound proposed action trains (half of total trips) to no-action trains 10.9 times per week.

The far-right column of Table 3.15-11 illustrates the average daily train occupancy time at selected grade crossing for all trains (no-action and proposed action trains). Appendix L, *Vehicle Traffic Analysis*, provides the daily occupancy time at all crossings.

Table 3.15-11. Average Daily Train Occupancy Times[a] at Selected Grade Crossings—No-Action Alternative and Proposed Action

Grade Crossing	No-Action Alternative	Proposed Action[b]
Fleet Street	49 minutes	1 hour 48 minutes
East Heron Street	1 hour 10 minutes	2 hours 18 minutes
Port Industrial Road	14 minutes	1 hour 23 minutes
West 1st Street	17 minutes	1 hour 37 minutes
Industrial Road	43 minutes	2 hours 19 minutes

[a] Occupancy times rounded to the nearest minute.
[b] Times include no-action and proposed action trains.

The addition of proposed action trains would substantially increase the average daily occupancy at grade crossings in Aberdeen. For example, the average daily train occupancy time at the East Heron Street crossing is currently 1 hour and 10 minutes from grain, auto, and mixed carload freight trains. With the addition of proposed action train trips, the average daily train occupancy time at East Heron Street would increase to 2 hours and 18 minutes. Impacts of these blockages on vehicles and pedestrians are discussed in Section 3.16, *Vehicle Traffic and Safety*.

3.15.6 What required permits and plans apply to rail traffic?

No required permits or plans apply to rail traffic.

3.15.7 What mitigation measures would reduce impacts on rail traffic?

This section describes the applicant mitigation measures as well as other measures that would reduce impacts on rail traffic from construction and routine operation of the proposed action.

Impacts on vehicle traffic delay at grade crossings and measures to mitigate such impacts are discussed in Section 3.16, *Vehicle Traffic and Safety.* The potential for increased risks during onsite, rail, and vessel operations (e.g., storage tank failure, train derailment, or vessel collision) and the related environmental consequences (e.g., release of crude oil or other proposed bulk liquids) and any additional mitigation are addressed in Chapter 4, *Environmental Health and Safety*.

3.15.7.1 Applicant Mitigation

Impacts on rail traffic resulting from the proposed action are considered low and would not necessitate mitigation beyond the minimum requirements specified by applicable laws and regulations. Section 3.16, *Vehicle Traffic and Safety*, addresses mitigation measures for vehicle delay impacts at grade crossings.

3.15.7.2 Other Measures to Be Considered

Although rail traffic impacts are considered to be low, to further improve safety along the PS&P rail line, PS&P should consider designating a position to plan and coordinate emergency response plans and lead implementation of community awareness programs such as Operation Lifesaver and a *See Something Say Something* program. Chapter 4, *Environmental Health and Safety*, further addresses rail safety mitigation measures.

3.15.8 Would the proposed action have unavoidable and significant adverse impacts on rail traffic?

There would be no unavoidable and significant impacts. Mitigation to address vehicle traffic and safety delay from increased rail traffic is addressed in Section 3.16, *Vehicle Traffic and Safety*.

3.16 Vehicle Traffic and Safety

Vehicles provide transportation for individuals to travel to work, school, and for recreational purposes. Vehicles also are used for emergency response and for the delivery of commercial goods that support economic activity. Vehicle delays increase travel time for motorists and can affect quality of life and economic growth.

This section describes vehicle traffic and safety in the study area, including existing traffic congestion and safety conditions. It then describes impacts on vehicle traffic and safety that could result under the no-action alternative or as a result of the construction and routine operation[1] of the proposed action. Finally, this section presents any measures identified to mitigate impacts of the proposed action on vehicle traffic and safety and any remaining unavoidable and significant adverse impacts.

3.16.1 What is the study area for vehicle traffic and safety?

The study area for vehicle traffic and safety consists of the roadways near the project site that could be affected by increased vehicle traffic from construction and routine operation of the proposed action. The study area also includes the public roadways that cross the Puget Sound & Pacific Railroad (PS&P)[2] rail line.

3.16.2 What laws and regulations apply to vehicle traffic and safety?

The laws and regulations for determining potential impacts on vehicle traffic and safety are summarized in Table 3.16-1. More information about these laws and regulations and applicable land use policies is provided in Appendix B, *Laws and Regulations*. For additional details related to rail operations, see Section 3.15, *Rail Traffic*.

[1] Chapter 4, *Environmental Health and Safety*, addresses the potential impacts from increased risk of incidents (e.g., storage tank failure, train derailments, vessel collisions) and related consequences (e.g., release of crude oil or other proposed bulk liquids).

[2] The PS&P rail line refers to the rail line between the BNSF main line in Centralia and the project site.

Table 3.16-1. Laws and Regulations for Vehicle Traffic and Safety

Laws and Regulations	Description
Federal	
Railroad Safety Act of 1970 (49 U.S.C. 20101–20144; 21301–21304)	Authorizes FRA with rulemaking authority over all areas of rail line safety.
Highway Safety Act (23 U.S.C. 4), Railroad Safety Act (49 CFR 200–299)	Gives FHWA and FRA regulatory jurisdiction over safety at federal highway/rail grade crossings.
Railroad Safety Enforcement Procedures (49 CFR 200-209)	Grants FRA authority to regulate safety, track, signaling, and rolling stock for common carrier rail lines that are part of the general rail line system of transportation.
Manual on Uniform Traffic Control Devices (23 U.S.C. 109(d))	Provides standards and guidelines for traffic control devices.
State	
Transportation System Policy Goals (RCW 47.04.280)	Establishes the following goals for the transportation system in Washington State: economic vitality, preservation, safety, mobility, environment, and stewardship.
Railroads—Operating Requirements and Regulations (RCW 81.48)	Establishes railroad operating requirements and regulations with regard to obstruction of trains, train speed, and safety.
Railroads—Crossings (RCW 81.53)	Provides standards, preference, and guidelines for highway rail crossings.
Motor Vehicles—Rules of the Road (RCW 46.61)	Establishes rules of the road for vehicle and rail crossings.
Grade-Crossing Petitions (WAC 480-62-150)	Requires that a petition is filed for creation or changes to a grade crossing.
City Streets as Part of State Highways (RCW 47.24)	Regulates the maintenance and jurisdictional control for city streets that are part of state highways.
Local	
Traffic Regulations (AMC 10.64 and HMC 1.45)	Establishes regulations for vehicle traffic and emergency services in the respective cities.

FRA = Federal Railroad Administration U.S.C. = United States Code; FR = Federal Regulation RCW = Revised Code of Washington; OPA 90 = Oil Pollution Act of 1990

3.16.3 How were impacts on vehicle traffic and safety evaluated?

This section describes the sources of information methods used to evaluate impacts. Additional details are presented in Appendix L, *Vehicle Traffic Analysis*.

3.16.3.1 Information Sources

Several data sources were used to characterize vehicle traffic, including grade-crossing[3] delay and safety conditions.

[3] Grade crossings are intersections of a rail line and a highway at the same grade—no overpasses or underpasses separate the crossing.

- Annual average daily traffic volumes adjusted to the analysis year (2017 or 2037). The adjusted annual average daily traffic volumes were used to determine peak hour traffic volumes.
- Existing train traffic (average number of trains per day) and operating speed on the PS&P rail line (Federal Railroad Administration 2014a).
- Future vehicle and train traffic to and from the project site as estimated by the applicant (Chapter 2, *Proposed Action and Alternatives*).
- Train characteristics, including number of cars (train length) and speed.

Vehicle Traffic

Estimates of annual average daily traffic for vehicles at each public road crossing along the PS&P rail line were calculated for existing year, 2017, and 2037 based on data obtained from local agencies, Washington State Department of Transportation (WSDOT), and Federal Railroad Administration (FRA). Annual average daily and peak hour traffic volumes were factored to reflect the analysis years (2017 and 2037). Field observation and data collection supplemented available traffic volumes. These data were used to characterize estimated future vehicle traffic along area roadways adjacent to grade crossings of the PS&P rail line.

The following planning studies address vehicle delay and safety in the study area:

- The *U.S. 101 Regional Circulation Project Report* (Washington State Department of Transportation 2007) examined congestion along the US Route 101 (US 101) corridor, US Route 12 (US 12), and State Route 109 (SR 109) in Aberdeen, Hoquiam, and Cosmopolis. Intersections were found to be experiencing congestion issues and moderate levels of vehicle delay.
- A planning study by the Grays Harbor Council of Governments is underway. The East Aberdeen Mobility Project will identify ways to relieve congestion and improve safety along US 12 and potential improvements to access into the Olympic Gateway Plaza.

Vehicle Safety

Ten years of collision records (2003 to 2013) for the study area were obtained from WSDOT and FRA (Washington State Department of Transportation 2014; Federal Railroad Administration 2014a).

3.16.3.2 Impact Analysis

The following sections describe the methods for the impact analysis. More information on the methods is located in Appendix L, *Vehicle Traffic Analysis*.

Onsite

The onsite impact analysis considered the number of trips that would be generated by employees traveling to and from the project site during construction and operations. As noted in Chapter 2, *Proposed Action and Alternatives*, transport of crude oil or bulk liquids associated with the proposed action would rely on rail and vessel transport. It is anticipated that tanker truck traffic would remain the same as for existing conditions and would not change average daily traffic on surrounding roadways.

Rail

The analysis of vehicle impacts along the PS&P rail line considered the potential impact on vehicle traffic and safety associated with rail traffic related to operation of the proposed action at maximum throughput. In other words, this analysis assumes that the proposed action would begin operating rail traffic at 100% throughput. However, a more gradual ramp-up may occur, during which additional infrastructure improvements, could offset some of the impacts identified in this section. The potential vehicle impacts addressed in this analysis include increases in average vehicle delay in a 24-hour period (average vehicle delay), peak hour vehicle delay, vehicle queuing, vehicle safety, and emergency access. The analysis evaluates existing conditions (2015), opening year (2017) conditions when proposed action trains would begin to operate on the PS&P rail line, and 2037 conditions. This 20-year horizon provides a general assessment of vehicle traffic and safety conditions in the future.

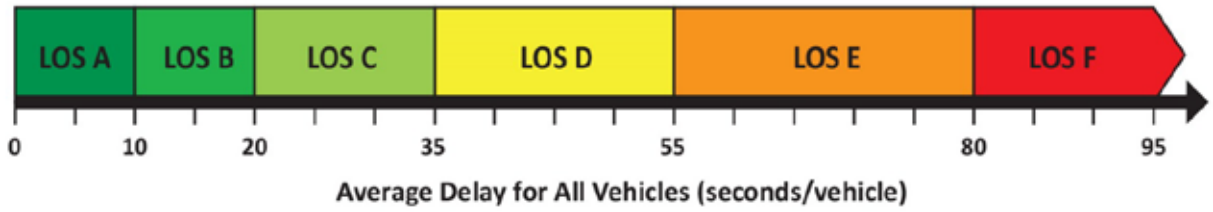
Section 3.15, *Rail Traffic*, describes the switching operations when a train arrives at the project site. As described in that section, an alternative method could deliver rail cars to the project site that would reduce train occupancy times at the grade crossings between Poynor Yard and the project site in the Port of Grays Harbor area. However, this alternative method would not be the most cost-efficient and time-efficient approach for PS&P and is not anticipated to be the preferred method to deliver rail cars to the project site. For this reason, the vehicle analysis assumes the switching operations method that would have a greater impact on vehicle traffic in the Port of Grays Harbor area.

Average Vehicle Delay

Unlike passenger trains, freight trains do not run on a schedule. Railroad companies evaluate each situation and dispatch trains based on a number of criteria, including available crew, number of cars, cost of fuel, and overall revenue. Analysis and projection of the impact of rail operations requires analyzing the rail traffic and developing typical operations. These operations measurements and support analysis and projections, as addressed in Section 3.15, *Rail Traffic*. Because trains along the PS&P rail line do not run on a schedule, this analysis uses average vehicle delay as the primary method to characterize vehicle delay at PS&P rail line grade crossings.

A level of service (LOS) scale rates the quality of traffic operations on a given transportation facility by using letter grades A through F (Transportation Research Board 2010). LOS designations were used to provide a qualitative measure of average vehicle delay at grade crossings (Figure 3.16-1). The letter grades are based on the average vehicle delay that drivers would experience at a PS&P grade crossing, with LOS A representing the least delayed conditions with an average delay for all vehicles between 0 and 10 seconds. A LOS F indicates the most delayed conditions (average vehicle delay of more than 80 seconds).

Figure 3.16-1. Level of Service Designations



According to WSDOT LOS standards, LOS D or better is acceptable for urban highways and LOS C or better is acceptable for rural highways in Grays Harbor County and Thurston County (Washington State Department of Transportation 2009). The local jurisdictions along the PS&P rail line do not have LOS standards for PS&P grade crossings. Therefore, the WSDOT LOS standard of D was generally used as guidance to determine potential vehicle delay impact at PS&P grade crossings. However, because there are no applicable LOS standards for non-WSDOT facilities, this standard is not a required threshold to determine significance of the impact.

Average vehicle delay was calculated at each public PS&P grade crossing in the study area to determine how the crossings would operate in 2017 and 2037[4] for the no-action alternative and the proposed action. The average delay per vehicle in a 24-hour period is based on the estimated time each train would block the crossing, the average number of trains per day, and grade-crossing characteristics (such as annual average daily traffic and number of roadway lanes). This average vehicle delay in seconds per vehicle was then converted to the applicable LOS designation (Figure 3.16-1) to provide a qualitative measure of vehicle delay at PS&P grade crossings for comparison with the no-action alternative.

Peak Hour Vehicle Delay

As previously noted, it is not possible to predict when a train might travel on the PS&P rail line under existing conditions or related to the proposed action. To describe the highest potential vehicle delay impacts that could occur related to the proposed action, an analysis of vehicle delay during the peak traffic hour was completed. The peak traffic hour is the hour of the day when the highest number of vehicles travel study area roads. It was assumed that the longest unit train would travel during the peak hour of traffic. Vehicle traffic during the peak hour was assumed to be 11.5% of the annual average daily traffic data based on available traffic count data, except where location-specific hour traffic data were available. The LOS scale in Figure 3.16-1 was used to assess peak hour vehicle delay.

The peak hour vehicle delay assumes the longest train under consideration (a grain train for existing conditions and no-action alternative, and a unit train for the proposed action) would operate during the peak hour. This is a very conservative assumption, because based on the average number of trains operating per day under existing conditions, the no-act ion alternative, and the proposed

[4] The annual traffic growth rate at PS&P rail line grade crossings between 2017 and 2037 was assumed to be 1.5% based on available traffic count data and input from the Washington State Department of Transportation.

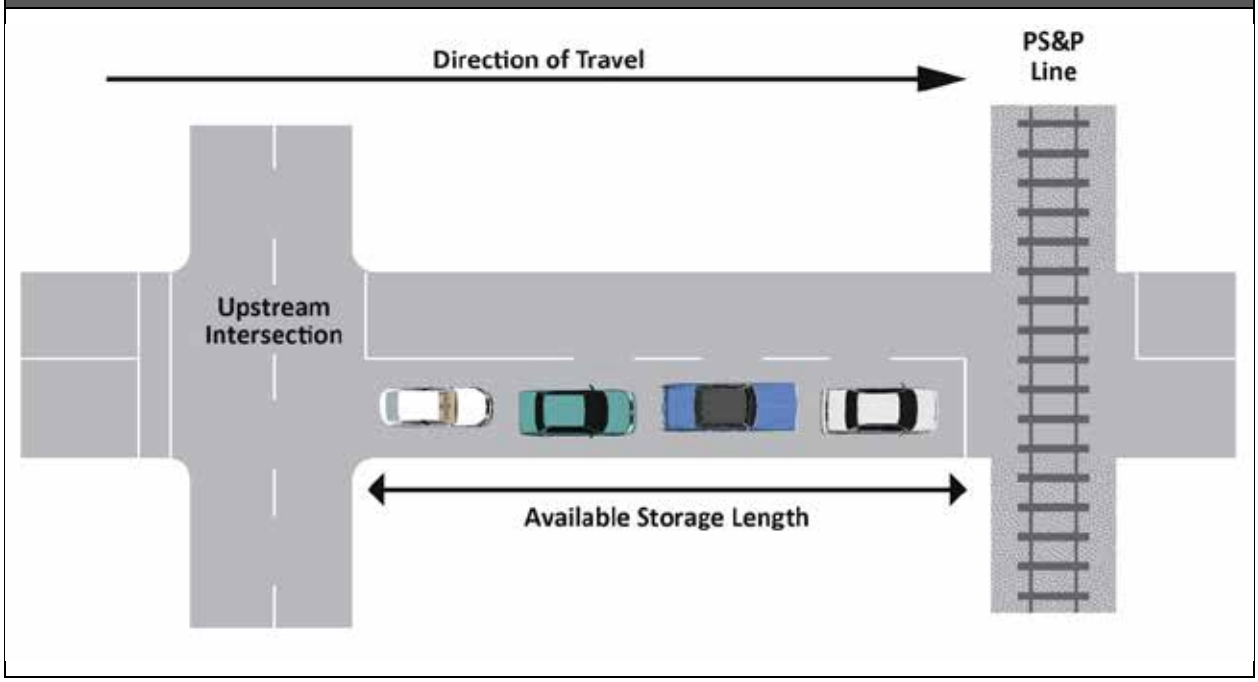
action, there would be a low probability that a train related to the proposed action would travel during the peak traffic hour.

Vehicle Queuing

Vehicle delay from trains blocking grade crossings can affect upstream intersections. Each PS&P grade crossing has a storage length to store vehicles when the crossing is blocked. The available storage length is the distance between the crossing and upstream intersection (Figure 3.16-2). As vehicles queue, the distance that vehicles extend back from the crossing while waiting at a blocked crossing increases.

Years 2017 and 2037 vehicle volumes were used to calculate average queue length to determine if the queue length exceeded the available storage capacity. Queue length, which is the total average length of vehicles per lane, was calculated based on the number of vehicles delayed due to gate down times throughout a 24-hour period and an average vehicle length of 20 feet. Queue lengths were calculated at 25 key crossings in the study area.

Figure 3.16-2. Illustration of Available Storage Length



Vehicle Safety

Vehicle safety at PS&P grade crossings was analyzed by estimating future accident frequency and the corresponding predicted interval between accidents with and without the addition of proposed action rail traffic. The FRA GradeDec.Net model was used to analyze public PS&P grade crossings (Federal Railroad Administration 2014b). This model accounts for accident history and frequency of trains at existing at-grade crossings, volume of vehicle traffic, existing safety devices at the at-grade crossings, and other factors to determine the potential impacts of an increase in rail traffic. For

grade crossings not included in the GradeDec.Net model, the FRA accident prediction formula was used to calculate a total predicted annual accident rate.

Emergency Access

An increase in vehicle delay at PS&P grade crossings could affect emergency access and response time. A qualitative analysis was conducted to identify potential impacts on emergency vehicle response and access under the proposed action at PS&P grade crossings. The analysis identified areas along the PS&P rail line where the emergency vehicle response and access would substantially change.

3.16.4 What are the existing vehicle traffic and safety conditions in the study area?

This section describes vehicle traffic and safety conditions in the study area that could be affected by construction and routine operation of the proposed action. The specific roadways and grade crossings considered in the analysis are presented in Appendix L, *Vehicle Traffic Analysis*.

3.16.4.1 Vehicle Traffic

This section provides a summary of existing vehicle traffic conditions related to onsite operations at the project site and from existing rail traffic along the PS&P rail line.

Onsite

Under existing conditions, vehicle trips generated by employees regularly on site are estimated to be 50 per day.

Rail

This section provides general information about vehicle traffic in the context of the PS&P grade crossings in the study area, key areas of vehicle delay in the study area, and planning studies to address vehicle delay. Appendix L, *Vehicle Traffic Analysis*, identifies the emergency service providers in the study area.

The road network from Centralia consists of arterial, collector, and local roads that cross and parallel the PS&P rail line. Figure 3.15-2 and 3.15-3 in Section 3.15, *Rail Traffic*, illustrate the PS&P rail line. There are 81 public at-grade crossings of the PS&P rail line between Centralia and the project site. Information on the PS&P grade crossings in the study area is summarized as follows.

- Roadways with grade crossings on the PS&P rail line are classified as follows: four arterials, 13 collectors, and 64 local roads.
- The annual average daily traffic in both directions at the 81 grade crossings ranges from approximately 20 vehicles (at four crossings) to approximately 17,310 vehicles (at Port Industrial Road in Aberdeen).
- The annual average daily traffic at the 81 crossings is approximately 1,425 vehicles. However, 60 of the 81 crossings have an average daily traffic of less than 900 vehicles.

Table 3.16-2 illustrates the 10 grade crossings with the highest average daily traffic from Centralia to the project site, and the existing LOS for average and peak hour vehicle delay. Three crossings are located in Centralia, one is located in unincorporated Thurston County and Satsop, and five crossings are located in Aberdeen.

Table 3.16-2. Top 10 Grade Crossings by Annual Average Daily Traffic

Grade Crossing	Milepost	Location	Approximate 2015 Annual Average Daily Traffic	Level of Service (Average Vehicle Delay)	Level of Service (Peak Hour)
Tower Street (State Route 507)	0.82	Centralia	7,785	A	F
Pearl Street (State Route 507)	0.89	Centralia	13,340	A	F
West Reynolds Street	2.14	Centralia	6,190	A	C
Old Highway 99 SW	6.07	Unincorporated Thurston County	9,850	A	C
Monte Elma Road	51.98	Satsop	4,625	A	A
Tyler Street	68.23	Aberdeen	3,925	B	F
South Chehalis Street	68.36	Aberdeen	4,760	C	F
Port Industrial Road	70.06	Aberdeen	17,310	A	F
West 1st Street	70.41	Aberdeen	4,485	A	E
Industrial Road	71.04	Aberdeen	5,620	B	F

Vehicle delay occurs in several areas along the PS&P rail line. The two most substantial areas of vehicle traffic along the PS&P rail line are in Centralia and Aberdeen, as shown in Table 3.16-2.

Centralia

Traffic congestion issues exist in Centralia at the Tower Street and Pearl Street PS&P grade crossings when trains are delayed in entering the BNSF Railway Company (BNSF) main line and wait on the PS&P rail tracks, blocking the Tower Street and Pearl Street crossings. Delays are also experienced if a train were to pass during the Tower Street and Pearl Street crossings during the peak traffic periods.

Aberdeen

Traffic along the US 101 and US 12 corridors between Aberdeen and Hoquiam is becoming more congested due to growth at the Port of Grays Harbor and overall vehicle traffic growth from population growth (Grays Harbor Council of Governments 2009).

In the Olympic Gateway Plaza and Port of Grays Harbor areas in Aberdeen, existing vehicle delay is further worsened by current rail operations at Poynor Yard. As described in Section 3.15, *Rail Traffic*, trains leaving Aberdeen traveling east typically have more cars than one yard track can hold,

and it is necessary to couple cars located on multiple tracks in Poynor Yard to create one eastbound train. These operations block the seven PS&P grade crossings east of the Wishkah River. Figure 3.15-4 in Section 3.15, *Rail Traffic*, illustrates the location of these crossings. East Heron Street, the crossing furthest to the west and closest to Poynor Yard, has the longest blockage time. Fleet Street, the crossing furthest to the east has the shortest blockage time of the crossings in the Olympic Gateway Plaza area. Section 3.15, *Rail Traffic*, describes the duration and frequency that trains block these crossings.

At times, all entrances to the Olympic Gateway Plaza can be blocked. This occurs periodically when a grain or auto train is moving east from the Port of Grays Harbor area. As a result, the Grays Harbor Council of Governments is leading a study, called the East Aberdeen Mobility Project, to examine ways to relieve congestion, improve safety along US 12, and improve access into the Olympic Gateway Plaza. Options being considered include possible grade- separated entrances to the plaza.

Trains also block the crossings west of Poynor Yard. As described in Section 3.15, *Rail Traffic*, switching operations[5] related existing operations at the project site and adjacent industrial site block the crossings west of Poynor Yard, including Port Industrial Road, West 1st Street, and Industrial Road. Figure 3.15-5 in Section 3.15, *Rail Traffic*, illustrates the location of these crossings. Section 3.15 also describes the duration and frequency that trains block these crossings.

3.16.4.2 Vehicle Safety

Collision records in the study area from 2003 to 2013 identified one collision involving a train that resulted in a possible injury at the Olympic Gateway Plaza access between Chehalis Street and Tyler Street in Aberdeen (Washington State Department of Transportation 2014; Federal Railroad Administration 2014a). The collision involved a right-turning vehicle not yielding the right-of-way to a slow-moving train.

3.16.5 What are the potential impacts on vehicle traffic and safety?

This section describes vehicle traffic and safety impacts that could occur in the study area. Potential impacts of the no-action alternative are described first as a baseline for comparing the potential impacts of the proposed action.

3.16.5.1 No-Action Alternative

Under the no-action alternative, the applicant would continue to operate its existing facility as described in Chapter 2, *Proposed Action and Alternatives*. As noted in Section 3.16.4.1, *Vehicle Traffic*, existing rail operations that serve the project site and the immediately surrounding industrial area currently contribute to existing vehicle delays. Under the no-action alternative, these operations would continue to result in vehicle delays and grade-crossing safety concerns that are expected to increase slightly over the analysis period (2017 to 2037), primarily as the result of predicted

[5] Switching operations are generally related to disassembling unit trains by setting rail cars on multiple tracks, rearranging rail cars on tracks to facilitate loading or unloading, sorting rail cars by destination, delivering rail cars to an industry, picking up rail cars from an industry, or assembling unit trains from rail cars on multiple tracks.

increases in vehicle traffic. Rail traffic anticipated under the no-action alternative is discussed in Section 3.15, *Rail Traffic*.

The complete results of the vehicle analysis are presented in Appendix L, *Vehicle Traffic Analysis*. The following summarizes key vehicle traffic and safety findings under the no-action alternative in 2017 and 2037. The analysis addresses three topics: vehicle delay (year 2017), vehicle delay (year 2037), and vehicle safety.

Vehicle Delay (Year 2017)

The following sections describe vehicle delay from ongoing operations at the project site and from rail operations along the PS&P rail line that would be expected in 2017 under the no-action alternative.

Onsite

Because the proposed action would not be constructed, the number of trips generated at the project site is anticipated to be the same as described for existing conditions.

Rail

Average Vehicle Delay

All PS&P grade crossings under the no-action alternative would operate at LOS C or better in 2017; no grade crossings would operate at or below LOS D in 2017.

Peak Hour Vehicle Delay

All crossings that would operate at LOS E or F are located in Centralia and Aberdeen (Olympic Gateway Plaza area and Port of Grays Harbor area). Under the no-action alternative, substantial vehicle delay would occur in these areas if a grain train, the longest train currently operating on the PS&P rail line, passes through the corridor during the peak traffic hour. Table 3.16-3 illustrates the grade crossings that would operate at LOS E or F during the peak traffic hour. All seven crossings in east Aberdeen in the Olympic Gateway Plaza area would operate at LOS F during the peak traffic hour. All crossings between Port Industrial Road and the project site would operate at LOS E or F.

Table 3.16-3. Grade Crossings Operating Below Level of Service D during the Peak Traffic Hour – No-Action Alternative (2017)

Grade Crossing	Level of Service (Peak Hour Delay)
Centralia	
Tower Street (SR 507)	F
Pearl Street (SR 507)	F
East Aberdeen (Olympic Gateway Plaza Area)	
Fleet Street	F
Tyler Street	F
McDonalds Entrance	F
Dairy Queen Entrance	F
South Chehalis Street	F
Newell Street	F
East Heron Street	F
Port of Grays Harbor	
Port Industrial Road	F
West 1st Street	E
North Maple Street	F
Industrial Road	F

Average Vehicle Queuing

Table 3.16-4 illustrates the grade crossings that would exceed the available storage length under the no-action alternative in 2017. The queue lengths at these crossings would back into upstream intersections.

Table 3.16-4. Average Queue Lengths Exceeding Available Storage Length—No-Action Alternative (2017)

Grade Crossing	Queue Direction	Crossing Location	Upstream Intersection Affected by Queue
Centralia			
Tower Street (SR 507)	Northbound	SR 507 northbound in central Centralia.	4th Street
Pearl Street (SR 507)	Southbound	SR 507 southbound in central Centralia.	6th Street
East Aberdeen (Olympic Gateway Plaza Area)			
Fleet Street	Northbound	Exit from Olympic Gateway Plaza at US 12.	Olympic Gateway Plaza parking lot
Tyler Street	Northbound	Exit from Olympic Gateway Plaza at US 12	Olympic Gateway Plaza parking lot
Chehalis Street	Northbound	Exit from Olympic Gateway Plaza at US 12	Olympic Gateway Plaza parking lot
East Heron Street	Eastbound Right-Turn	Right-turn from US 12 eastbound to Olympic Gateway Plaza.	South F Street

Two crossings are located in Centralia (State Route 507 [SR 507] in central Centralia) and four crossings are in east Aberdeen in the Olympic Gateway Plaza area. Crossings in the Olympic Gateway Plaza area would experience substantial queuing under existing conditions and queuing would continue or increase under the no-action alternative as traffic volumes increase.

Vehicle Delay (Year 2037)

The following sections describe vehicle delay from ongoing operations at the project site and from rail operations along the PS&P rail line that would be expected in 2037 under the no-action alternative. This scenario accounts for increased growth in vehicle traffic during the analysis period and the fact that some improvements to and along the PS&P rail line are likely to be made that could partially offset the potential for increased vehicle delay during this period.

Onsite

If the proposed action is not constructed, it is possible that another industrial use could occur at the project site; however because it is not possible to predict, it is assumed that the number of trips generated at the project site would not change over the 20-year analysis period (2017 to 2037).

Rail

Average Vehicle Delay

All PS&P grade crossings under the no-action alternative would operate at LOS C or better in 2037; no crossings would operate at or below LOS D.

In general, the average vehicle delay would decrease over the 20-year analysis period in east Aberdeen (Olympic Gateway Plaza area) because of infrastructure improvements to the Wishkah River bridge that would allow speeds to increase from 10 miles per hour to 20 miles per hour. Trains would move through grade crossings faster, thereby reducing vehicle delay at east Aberdeen crossings.

Future roadway improvements could further improve congestion and improve LOS. For example, as mentioned previously, possible options to alleviate congestion along US 12 in Aberdeen related to the East Aberdeen Mobility Project are under consideration, including the creation of grade-separated crossings; however, because the preferred alternative has not yet been determined and funding has not been identified, this project was not considered in transportation modeling.

Peak Hour Vehicle Delay

The same crossings that would operate at LOS E or F in 2017, as identified in Table 3.16-3, would also operate below LOS E or F in 2037. In addition, two crossings with a low annual daily traffic west of Poynor Yard (Washington Street and Heron Street) would operate at LOS F.

Average Queuing

The Industrial Road crossing would exceed the available storage length in 2037. In addition, the same PS&P grade crossings that would exceed available storage length in 2017 would also exceed available storage length in 2037.

- Centralia: Tower Street and Pearl Street
- East Aberdeen (Olympic Gateway Plaza area): Fleet Street, Tyler Street, Chehalis Street, East Heron Street

The queue lengths at Pearl Street and Tower Street crossings in Centralia and the Industrial Road crossing adjacent to the project site would grow by approximately 30% due to the anticipated growth in vehicle traffic between 2017 and 2037. This growth in vehicle traffic would extend queue lengths at crossings. However, the east Aberdeen crossings that would exceed available storage length in 2017 would only grow by approximately 10% by 2037 due to assumed rail improvements that would improve train speeds in east Aberdeen (Olympic Gateway Plaza area) and reduce the amount of time trains occupy PS&P grade crossings in east Aberdeen.

Emergency Vehicle Access

As described above, all PS&P grade crossings under the no-action alternative would operate at LOS C or better in 2017 for average vehicle delay. Average vehicle delay in 2017 between west of Centralia and east of Aberdeen is estimated to be between approximately 7 and 17 minutes daily. However, some crossings in Centralia and Aberdeen would operate at LOS E or F during the peak hour. Under the no-action alternative, substantial vehicle delay would occur in these areas if a grain train, the longest train currently operating on the PS&P rail line, passes through the corridor during the peak traffic hour. Emergency service providers would also experience this delay if an emergency vehicle encountered a train at a PS&P grade crossing. Additionally, as noted above, there are times (an average of four times per week) when all access into the Olympic Gateway Plaza is blocked for approximately 35 minutes. Although there are other locations along the PS&P rail line that would continue to have limited vehicle access under the no-action alternative, these areas would not be

affected for more than the typical amount of time for a train to pass (approximately 3 minutes) or there are alternative routes for emergency vehicles to take in the event of train.

Vehicle Safety

Under the no-action alternative, the predicted accident frequency of a train and motor vehicle collision would increase slightly over the 20-year analysis period because of the anticipated increase in annual average daily traffic at PS&P grade crossings.

In 2017, PS&P grade crossings that would have the shortest predicted interval between accidents would be in Aberdeen. This is due to rail operations east of the Poynor Yard (Olympic Gateway Plaza area) and west of the Poynor Yard (Port of Grays Harbor area), and the associated increased frequency of trains at these crossings from switching operations compared to the PS&P rail line east of Aberdeen. The grade crossings with the predicted highest interval between accidents include Industrial Road in the Port of Grays Harbor area, and the Dairy Queen and McDonald's driveways in the Olympic Gateway Plaza area. As with vehicle delay, accident frequencies would generally improve by 2037 for some crossings. This is due to planned improvement projects that were assumed to be implemented by 2037.[6] Additionally, infrastructure improvements considered for the East Aberdeen Mobility Project were not included in the safety analysis, but would likely improve both delay and safety at crossings in the Olympic Gateway Plaza area. The results of predicted accident intervals at PS&P grade crossings in 2017 and 2037 are provided in Appendix L, *Vehicle Traffic Analysis*.

The *Railroad-Highway Grade Crossing Handbook–Revised Second Edition* (Federal Highway Administration 2007) indicates that active devices with automatic gates should be considered as an option when certain criteria are met. One criterion is if the expected accident frequency, as calculated by the U.S. Department of Transportation Accident Prediction formula, exceeds 0.075. As shown in Appendix L, *Vehicle Traffic Analysis*, no crossings would exceed this frequency. Therefore, using this threshold, no crossings under the no-action alternative would warrant automatic gates.

3.16.5.2 Proposed Action

This section describes the vehicle traffic and safety impacts that could occur in the study area as a result of construction and routine operation of the proposed action. First, this section describes impacts from construction of the proposed action. It then describes impacts of routine operation at the project site and of routine rail and vessel transport to and from the project site.

Construction

As described in Chapter 2, *Proposed Action and Alternatives*, construction of the proposed action could occur in two phases, with approximately 76 workers for Phase 1 (lasting up to 18 months) and 110 workers for Phase 2 (lasting 3 to 4 months). It is assumed that for every one worker there would be one trip to and from the project site. Therefore, Phase 1 construction would generate approximately 152 trips and Phase 2 would generate approximately 220 vehicle trips.

[6] Appendix L, *Vehicle Traffic Analysis,* illustrates the planned infrastructure projects listed in WSDOT's 2014-2019 Transportation Improvement Plan that were included in the safety analysis. These projects include adding an early warning system and crossing gates, installing crossing gates and signs, and removing an existing crossing.

Average annual daily traffic on Industrial Road adjacent to the project site is estimated to be 5,800 vehicles in 2017. Therefore, construction-related vehicle traffic would result in an approximately 3.8% increase in traffic on Industrial Road adjacent to the site during Phase 2. Construction-related traffic would likely take varying routes to the project site and workers would have fluctuating schedules that would further spread out the potential for impacts over space and time. Additional vehicle trips to and from the site associated with this temporary increase in construction workers and the delivery of construction equipment and materials could increase vehicle delays and queue lengths at intersections surrounding the project site. However, the potential for additional construction-related vehicle trips to affect vehicle delay times, including emergency vehicle delay times would be low.

In addition to construction vehicle traffic, increased rail traffic from delivery of construction materials could increase vehicle delays. However, the anticipated delay would typically be very similar to existing conditions because construction equipment and materials, if delivered by train, would likely occur in the form of additional cars on existing freight trains and would not increase the average number of trains per day to any appreciable extent. For these reasons, proposed action vehicle traffic would not be expected to cause a change in the LOS for the average vehicle for any of the PS&P grade crossings.

Operations

Onsite

Operation of the proposed action would result in an additional 30 employee vehicle trips per day to and from the project site. Assuming two trips per employee, this would result in a less than 1.0% increase in the average daily traffic on Industrial Road, and adjacent roadways would experience a negligible increase to average daily traffic. For these reasons, onsite operation of the proposed action would not contribute to a noticeable increase in vehicle delay.

Rail

As described in Section 3.15, *Rail Traffic*, operation of the proposed action at maximum throughput would add approximately two unit train trips[7] per day on average (730 per year maximum) along the PS&P rail line to approximately three train trips per day (1,235 per year) under the no-action alternative. This increase in train traffic would result in increased occupancy of PS&P grade crossings (Section 3.15, *Rail Traffic*). In general, these blockages would increase vehicle delay and reduce access.

The following sections outline the results of the vehicle traffic analysis under the proposed action. The results focus on selected PS&P grade crossings with the most potential for a vehicle to experience delay (i.e., highest average annual daily traffic) and the crossings that would have the most substantial vehicle delay impacts (i.e., LOS designation declines to E or F and queue lengths increase beyond existing storage capacity). Appendix L, *Vehicle Traffic Analysis* provides the results for all PS&P grade crossings. Similar to the no-action alternative, the analysis addresses four topics: vehicle delay (year 2017), vehicle delay (year 2037), emergency vehicle access, and vehicle safety.

[7] A trip represents one-way travel; in other words, an inbound trip and an outbound trip are counted as two trips.

Vehicle Delay (Year 2017)

The following sections describe vehicle delay at the project site and along the PS&P rail line in 2017 under the proposed action. As noted previously, this analysis assumes maximum throughput is achieved within the first year of operation. The following describes the average vehicle delay, peak hour vehicle delay, and average queuing in 2017 for PS&P grade crossings.

Average Vehicle Delay

Increased rail trips along the PS&P rail line related to the proposed action would increase average vehicle delay compared to the no-action alternative, because the average number of train trips would increase from approximately three trips per day to five trips per day. However, for the majority of the PS&P grade crossings, the increase in crossing blockage time would not result in a substantial decline in vehicle delay compared to the no-action alternative because the potential to encounter a train at any crossing for the average vehicle would be low. In addition, as previously described, the annual average daily traffic for a majority of crossings is low. Sixty of the 81 public PS&P grade crossings have an annual average daily traffic of fewer than 900 vehicles. The approximate total vehicle delay in a 24-hour period between west of Centralia and east of Aberdeen would be between approximately 13 and 36 minutes daily compared to between 7 and 17 minutes under the no-action alternative. Therefore, the total blockage time would increase up to approximately 19 minutes in a 24-hour period. Because traffic volumes are low at a majority of the crossings, an increase in train trips on the PS&P rail line would not substantially increase the average vehicle delay at most PS&P grade crossings compared to the no-action alternative.

Table 3.16-5 provides a summary of average vehicle delay at the grade crossings with the highest annual average daily traffic. Because these crossings have the highest annual average daily traffic, vehicles at these crossings have highest probability to experience vehicle delay at grade crossings.

Table 3.16-5. Level of Service at Selected Grade Crossings—Proposed Action (2017)

Grade Crossing	Milepost	Location	Approximate 2017 Annual Average Daily Traffic	No-Action Alternative	Proposed Action
Tower Street (SR 507)	0.82	Centralia	8,025	A	B
Pearl Street (SR 507)	0.89	Centralia	13,755	A	B
West Reynolds Street	2.14	Centralia	6,380	A	A
Old Highway 99 SW	6.07	Unincorporated Thurston County	10,160	A	A
Monte Elma Road	51.98	Satsop	4,770	A	A
Tyler Street	68.23	Aberdeen	4,050	B	D
South Chehalis Street	68.36	Aberdeen	4,905	C	E
Port Industrial Road	70.06	Aberdeen	17,845	A	D
West 1st Street	70.41	Aberdeen	4,625	A	D
Industrial Road	71.04	Aberdeen	5,795	B	F

As shown in Table 3.16-5, PS&P grade crossings in Aberdeen (Olympic Gateway Plaza area and Port of Grays Harbor area) would experience the most substantial increase in average vehicle delay with the addition of proposed action trains. All grade crossings that would operate at or below LOS D in 2017 are located in Aberdeen. These grade crossings are located in two general areas:

- Olympic Gateway Plaza area: As illustrated in Figure 3.16-3, average vehicle delay would worsen at the Olympic Gateway Plaza area with the proposed action. As described in Section 3.15, *Rail Traffic*, existing train-building activities at Poynor Yard require rail cars to extend across the Wishkah River bridge and block crossings at the west end of the Olympic Gateway Plaza area. The addition of on average, two unit train trips per day (an average of one train trip per day eastbound) under the proposed action would lengthen the average vehicle delay at these crossings. The level of service at the East Heron Street, Newell Street, and South Chehalis Street crossings at the Olympic Gateway Plaza would degrade from LOS C or LOS D under the no-action alternative to LOS E or F under the proposed action. The crossings further east in the Olympic Gateway Plaza area would degrade from LOS B to LOS D.
- Port of Grays Harbor area: As illustrated in Figure 3.16-4, the Industrial Road crossing at the project site would operate at LOS F (LOS B with the no-action alternative). The increase in the average vehicle delay at the Industrial Road crossing is due to the delivery of rail cars from the PS&P rail line across Industrial Road to the project site, as described in Section 3.15, *Rail Traffic*. The Port Industrial Road and West 1st Street crossings would operate at LOS D due to switching operations west of Port Industrial Road.

In summary, five intersections that would operate at or above LOS D under the no-action alternative would operate below LOS D for the proposed action: Industrial Road (Port of Grays Harbor area), North Maple Street (Port of Grays Harbor area), East Heron Street (Olympic Gateway Plaza area), Newell Street (Olympic Gateway Plaza area), and South Chehalis Street (Olympic Gateway Plaza area).

Figure 3.16-3. 2017 Vehicle Delay at Selected Grade Crossings West of Poynor Yard (Imperium)

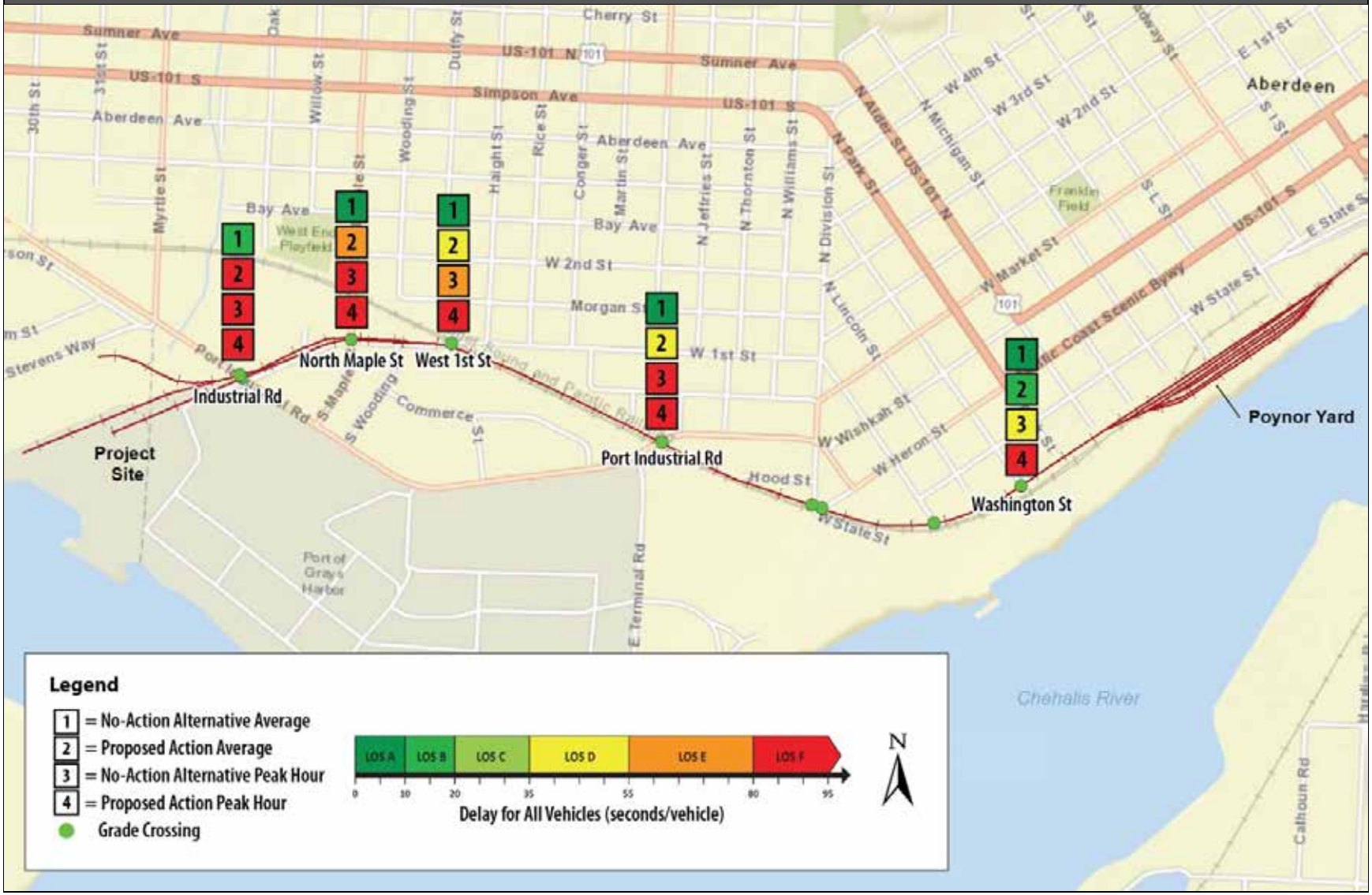
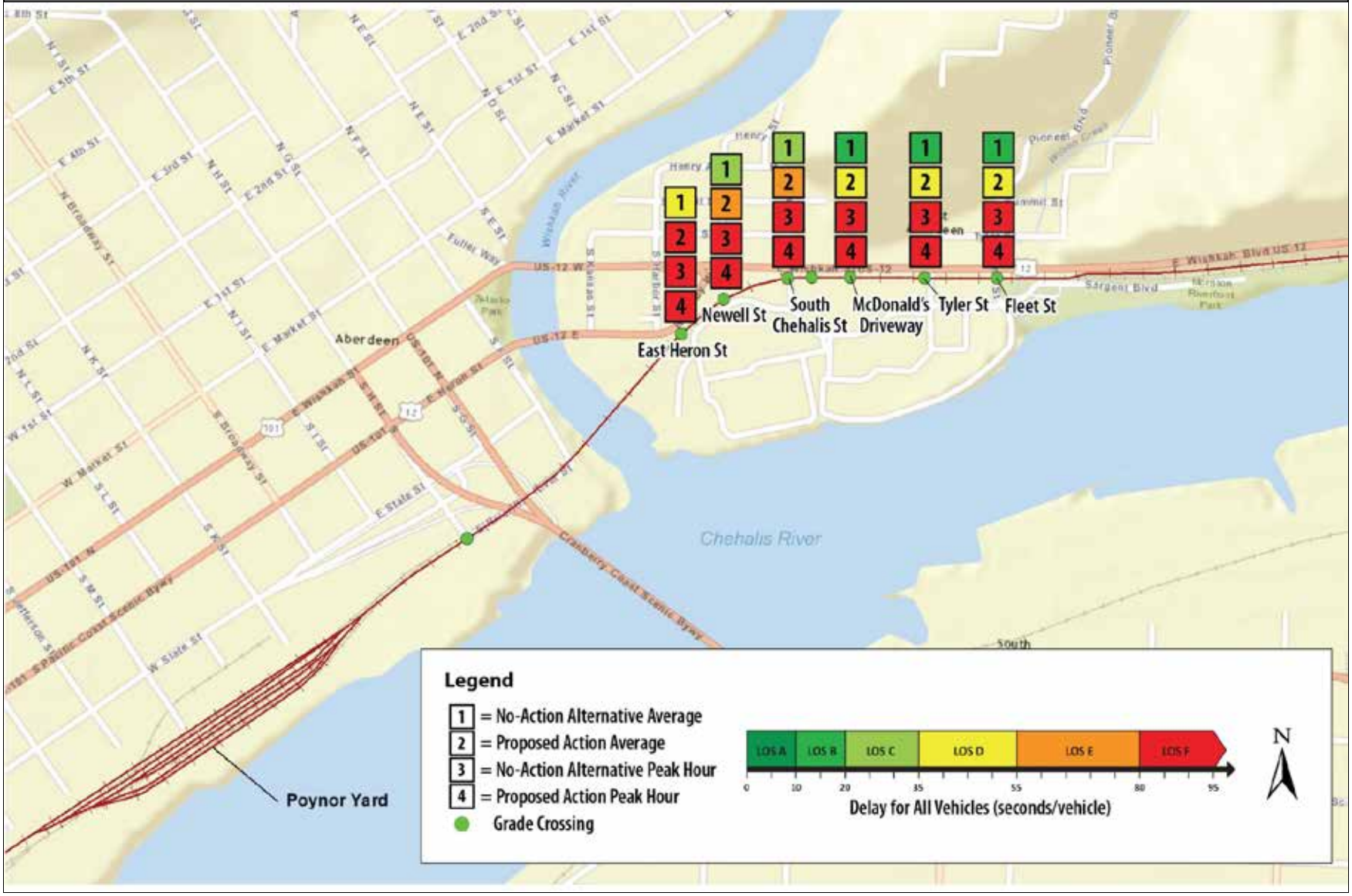


Figure 3.16-4. 2017 Vehicle Delay at Selected PS&P Line Crossings East of Poynor Yard (Imperium)



Section 3.16.6.3, *Applicant Mitigation,* identifies applicant mitigation to reduce vehicle delay impacts.

As noted in Section 3.16.3.2, *Impact Analysis*, the average vehicle delay analysis represents a conservative analysis for the average vehicle, because it is based on the following assumptions.

- **Maximum throughput.** The applicant would begin maximum throughput operations in 2017.
- **No trip diversion**. The vehicle delay analysis did not consider trip diversion (alternative routes for automobile traffic). Including trip diversion in the analysis would likely indicate shorter average vehicle delay at the Port of Grays Harbor area PS&P rail line crossings (grade crossings) because at some locations other routes would avoid crossing the PS&P rail line. For example, some vehicles at the Port Industrial Road crossing could divert to US 101 to travel to central Hoquiam. In the Olympic Gateway Plaza area, vehicles attempting to use the grade crossings on the west end of the plaza could divert to the crossings on the east end of the plaza (such as Fleet Street and Tyler Street). Those crossings would not be blocked for as long as the crossings on the west end of the Olympic Gateway Plaza (such as East Heron Street and Newell Street).
- **No planned rail infrastructure.** New infrastructure implemented in 2017 that could provide for increased train speeds (Section 3.15, *Rail Traffic*) could reduce vehicle delay at grade crossings. Infrastructure improvements were not included in the analysis.
- **Assumed throughput that affects switching operations.** As described in the impact analysis methods, the analysis assumes that PS&P would deliver rail cars to the site in a manner that is the most cost and time efficient. This method would increase the time that proposed action trains would block the grade crossing between Poynor Yard and the project site. A sensitivity analysis was conducted to determine the LOS for 50% throughput (i.e., requiring half the number of unit trips) in 2017. This analysis concluded that of the six grade crossings that would operate below LOS D for 100% throughput, five would operate at LOS D or better at 50% throughput. The East Heron Street grade crossing would continue to operate at LOS E at 50% throughput. All other grade crossings would operate at LOS D or better. Therefore, the analysis showed that while there would be an improvement in vehicle delay for 50% throughput, East Heron Street would continue to operate below LOS D.

Peak Hour Vehicle Delay

An analysis evaluated the potential vehicle delay of a proposed action train operating during the peak traffic hour. Because a proposed action train would be longer (120 rail cars) than an existing grain train (101 rail cars) analyzed under the 2017 no-action alternative for the peak hour scenario, the same grade crossings that would operate below LOS D (Table 3.16-3) would also operate below LOS D with the proposed action.

Table 3.16-6 provides a summary of summary of peak hour vehicle delay at the grade crossings with the highest annual average daily traffic.

Table 3.16-6. Level of Service (Peak Hour Vehicle Delay) at Selected Grade Crossings—Proposed Action (2017)

Grade Crossing	Milepost	Location	No-Action Alternative	Proposed Action
Tower Street (SR 507)	0.82	Centralia	F	F
Pearl Street (SR 507)	0.89	Centralia	F	F
West Reynolds Street	2.14	Centralia	C	D
Old Highway 99 SW	6.07	Unincorporated Thurston County	C	D
Monte Elma Road	51.98	Satsop	A	B
Tyler Street	68.23	Aberdeen	F	F
South Chehalis Street	68.36	Aberdeen	F	F
Port Industrial Road	70.06	Aberdeen	F	F
West 1st Street	70.41	Aberdeen	E	F
Industrial Road	71.04	Aberdeen	F	F

The peak hour vehicle delay would be most substantial in Centralia and Aberdeen. In Aberdeen, rail operations on the PS&P rail line are heavily influenced by activities related to Poynor Yard, as described in Section 3.15, *Rail Traffic*. Peak hour vehicle delay can be summarized as follows.

- Centralia: Similar to the no-action alternative (Table 3.16-3), the Tower Street and Pearl Street crossings would operate at LOS F. The H Street crossing would operate at LOS E.
- Olympic Gateway Plaza area: Similar to the no-action alternative, all grade crossings would operate at LOS F (Figure 3.16-3)
- Port of Grays Harbor area: All grade crossings would operate at LOS F (Figure 3.16-4)

Therefore, in Aberdeen, the peak hour analysis concluded substantial vehicle delay, with all grade crossings operating at LOS F, from the eastern end of the Olympic Gateway Plaza (Fleet Street) to the project site. Section 3.16.6.3, *Applicant Mitigation*, identifies measures to reduce vehicle delay impacts.

Average Queuing

As noted previously, increased vehicle delay from trains blocking grade crossings can have secondary impacts on nearby intersections. As vehicles begin to queue while waiting for the crossing to open, increased roadway congestion can affect upstream intersections. Table 3.16-7 illustrates the grade crossings that would have a queue that would exceed available storage length under the proposed action in 2017. This table also illustrates the increase in the queue length in number of cars compared to the no-action alternative. Of the grade crossings shown in the table, storage capacity is already exceeded under the no-action alternative, except for at Newell Street, Port Industrial Road, West 1st Street, and Industrial Road. While the proposed action would cause storage capacity problems at all the listed crossings, the problems already exist except at these crossings.

Table 3.16-7. Average Queue Lengths that Exceed Available Storage Length at Grade Crossings—Proposed Action (2017)

Grade Crossing	Queue Direction	Queue Location Description	Increase in Queue Length (Number of Cars)[a]
Centralia			
Tower Street (SR 507)	Northbound	SR 507 northbound couplet in central Centralia. Upstream affected intersection is 4th Street.	2
Pearl Street (SR 507)	Southbound	SR 507 southbound in central Centralia. Upstream affected intersection is 6th Street.	3
East Aberdeen/Olympic Gateway Plaza Area[b]			
Fleet Street	Northbound	Exit from Olympic Gateway Plaza at US 12.	4
Tyler Street	Northbound	Exit from Olympic Gateway Plaza at US 12	4
Chehalis Street	Northbound	Exit from Olympic Gateway Plaza at US 12	4
Newell Street[c]	Northbound	Exit from Olympic Gateway Plaza at US 12	1
East Heron Street	Eastbound Right-Turn Lane	Right-turn from SR 12 eastbound to Olympic Gateway Plaza. Upstream affected intersection is South F Street.	11
Port of Grays Harbor Area[b]			
West 1st Street[c]	Eastbound and Westbound	East of the project site and Port Industrial Road. Upstream affected intersection is Maple Street (eastbound) and Haight Street (westbound).	21
Port Industrial Road[c]	Eastbound and Westbound	Southeast of the project site. Upstream affected intersection is Terminal Road (eastbound) and Jefferson Street (westbound).	65
Industrial Road[c]	Eastbound and Westbound	Adjacent to applicant's project site. Upstream affected intersection is South and Myrtle Street (Eastbound) and Maple Street (westbound).	28

Notes:

[a] Increase in average queue length compared to the no-action alternative. Assumes 20 feet per car. For example, the proposed action average queue length at Fleet Street would be 80 feet longer than the no-action alternative.

[b] Grade-crossing location shown on Figures 3.16-3 and 3.16-4.

[c] Would not exceed available storage length under the no-action alternative. All other grade crossings also exceed available storage length under the no-action alternative.

The table illustrates that average queue lengths at the Tower Street and Pearl Street crossings in central Centralia, five of the seven Olympic Gateway Plaza area crossings, and three of the Port of Grays Harbor area crossings would be longer than the no-action alternative. At the Olympic Gateway Plaza area, the East Heron Street right-turn queue would extend approximately 11 cars longer than under the no-action alternative. The grade crossing at East Heron Street conflicts with Olympic Gateway Plaza traffic traveling eastbound on US 12, and serves as a bottleneck. During an eastbound

train event, the queue length could extend past F Street (upstream intersection) on the west side of the Wishkah River.

In the Port of Grays Harbor area, the West 1st Street and Industrial Road (at the project site) queue lengths would be approximately 21 and 28 cars longer, respectively, than the no-action alternative. The Port Industrial Road crossing queue would substantially increase (65 cars) compared to the no-action alternative due to lengthy project-related switching movements on Industrial Road. While the eastbound queue would stay contained within the Port area, a westbound queue stretching east past Division Street would begin to substantially affect local traffic flow in Aberdeen.

Similar to the vehicle delay analysis, the queuing analysis did not consider trip diversion. Including trip diversion in the analysis would likely indicate shorter average queue lengths at the Port of Grays Harbor area because there are other routes to avoid the grade crossings. For example, some vehicles could divert to US 101 to travel to central Hoquiam. In the Olympic Gateway Plaza area, vehicles attempting to use the crossings on the west end of the plaza (East Heron Street and Newell Street) could divert to the crossings on the east end of the plaza (Fleet Street and Tyler Street) because those crossings would not be blocked for as long.

Vehicle Delay (Year 2037)

As noted in Chapter 2, *Proposed Action and Alternatives*, transport of bulk liquids associated with the proposed facilities would rely on rail and vessel transport. It is anticipated that tanker truck traffic would remain the same as for existing conditions and would not affect average daily traffic on surrounding roadways. The potential grade-crossing safety and delay impacts of increased rail traffic related to the proposed action are discussed below.

For the majority of the grade crossings, the blockage time would not result in a substantial vehicle delay in 2037 because the potential to encounter a train at any crossing for any vehicle would be low. In addition, as previously described, the annual average daily traffic for a majority of crossings is low. Because traffic volumes are low at a majority of the crossings, an increase in train trips on the PS&P rail line would not substantially increase the average vehicle delay at most grade crossings.

Table 3.16-8 provides a summary of average vehicle delay at the grade crossings with the highest annual average daily traffic.

Table 3.16-8. Level of Service at Selected Grade Crossings—Proposed Action (2037)

Grade Crossing	Milepost	Location	Approximate 2037 Annual Average Daily Traffic	No-Action Alternative	Proposed Action
Tower Street (SR 507)	0.82	Centralia	10,375	A	B
Pearl Street (SR 507)	0.89	Centralia	17,790	A	B
West Reynolds Street	2.14	Centralia	8,250	A	A
Old Highway 99 SW	6.07	Unincorporated Thurston County	13,135	A	A
Monte Elma Road	51.98	Satsop	6,170	A	A
Tyler Street	68.23	Aberdeen	5,235	A	D
South Chehalis Street	68.36	Aberdeen	6,345	B	D
Port Industrial Road	70.06	Aberdeen	23,075	A	D
West 1st Street	70.41	Aberdeen	5,980	A	D
Industrial Road	71.04	Aberdeen	7,495	B	F

As noted under the 2037 no-action alternative, with the incorporation of PS&P infrastructure improvements that could allow for increased speeds in East Aberdeen (up to 20 miles per hour), the predicted declines in LOS would be slightly less than they would be under 2017 conditions. Four grade crossings would operate below LOS D:

- Newell Street (Olympic Gateway Plaza area)
- East Heron Street (Olympic Gateway Plaza area)
- North Maple Street (Port of Grays Harbor area)
- Industrial Road (Port of Grays Harbor area)

Average queue lengths would increase compared to 2017 proposed action conditions due to the increase in traffic over the 20-year period. Average queue lengths would also increase compared to no-action alternative conditions because of the blockage time associated with the addition of proposed action trains along the PS&P rail line. The grade crossings that would exceed the available storage length in 2037 would the same as 2017 (Table 3.16-7). The queue lengths at Pearl Street and Tower Street crossings in Centralia and the Port of Grays Harbor would grow by approximately 30% due to the anticipated growth in vehicle traffic between 2017 and 2037. The increase in queue lengths at grade crossings in east Aberdeen would grow less than 30% due to assumed rail infrastructure improvements that would improve train speeds in this area and reduce the amount of time trains occupy grade crossings in east Aberdeen by 2037.

Solutions being evaluated by ongoing regional planning efforts (such as the East Aberdeen Mobility Project) would alleviate some of the vehicle delay impacts related to the proposed action if such improvements are implemented by 2037. Further regional efforts to evaluate the potential for additional storage capacity would also help to mitigate increased delay at those locations.

Emergency Vehicle Access

As described in the vehicle delay analysis, average vehicle and peak hour delay would increase with the addition of proposed action trains because more trains would operate on the PS&P rail line. Because vehicle delay would increase, emergency vehicle delay would also increase at grade crossings. The following sections describe the impacts on emergency vehicle access, focused on the PS&P rail line between Centralia and Aberdeen, in Centralia, and in Aberdeen (Olympic Gateway Plaza and Port of Grays Harbor areas).

Between Centralia and Aberdeen

For the grade crossings between west of Centralia and east of Aberdeen, the average vehicle delay would slightly increase compared to the no-action alternative. As described previously, the projected 2017 daily crossing time between west of Centralia and east of Aberdeen would be between 13 and 36 minutes compared to between 7 and 17 minutes under the no-action alternative (Appendix L, *Vehicle Traffic Analysis*, provides daily crossing blockage times for all grade crossings.) Therefore, the average delay at grade crossings would increase 6 to 19 minutes in a 24-hour period from the addition of proposed action trains.

The addition of proposed action trains would affect emergency response times if an emergency vehicle was blocked at a grade crossing occupied by a proposed action train. The potential for the proposed action to affect emergency response would also depend on whether the dispatched emergency vehicle would need to cross the PS&P rail line and the availability of alternative routes if a train occupies the crossing at the time of the call.

There are land uses along the grade crossing where no alternate access is provided; crossing the PS&P rail line is required. Because the frequency of train traffic on the PS&P rail line would increase, the probability of an increase in emergency response time at these crossings would also increase. This impact would only occur if an emergency vehicle experienced a delay related a proposed action train that would operate two times per day. Section 3.16.6.3, *Applicant Mitigation,* identifies mitigation to reduce emergency response delay at grade crossings under the proposed action.

As described previously in the vehicle delay discussion, vehicle delay would be most substantial in Centralia and Aberdeen. Therefore, emergency response in Centralia and Aberdeen would experience the most delay from blocked grade crossings under the proposed action.

Centralia

The grade crossings in Centralia (BNSF main line to Reynolds Street crossing) are located in an urban area with a well-connected roadway network. The projected 2017 daily crossing time at grade crossings in Centralia would be 35 to 47 minutes compared to between approximately 17 and 26 minutes under the no-action alternative. Because emergency response providers are located on both sides of the PS&P rail line, similar to existing conditions, emergency response calls could be dispatched to stations that would not be blocked at a grade crossing. Section 3.16.6.3, *Applicant Mitigation*, identifies mitigation to reduce the impact of increased emergency response delay at grade crossings under the proposed action.

Olympic Gateway Plaza Area (Aberdeen)

Figures 3.15-6 and 3.15-7 in Section 3.15, *Rail Traffic*, illustrate the duration that existing and proposed action eastbound and westbound trains would occupy grade crossings in east Aberdeen

for each train type. In summary, in the Olympic Gateway Plaza area, an eastbound train—the maximum train event under the proposed action—would block the Fleet Street crossing (the grade crossing furthest to the east and least affected by Poynor Yard activities) for approximately 45 minutes under the proposed action compared to 37 minutes under the no-action alternative (eastbound grain train).

Unit train trips under the proposed action would also increase the frequency of trains occupying grade crossings in Aberdeen by approximately 14 times per week on average. All crossings in the Olympic Gateway Plaza area (from East Heron Street to Fleet Street) would be occupied for more than 35 minutes on average 3.8 times per week from eastbound grain and auto trains under the no-action alternative. Adding proposed action eastbound trains, these crossings would be occupied for more than 35 minutes on average 10.8 times per week. Section 3.15, *Rail Traffic*, provides additional information on blocked crossings in east Aberdeen.

Vehicle delays in the Olympic Gateway Plaza area are substantial because the seven grade crossings at the plaza provide the only vehicular emergency access to and from the plaza area and Morrison Riverfront Park, immediately east of the plaza. Emergency response vehicles would experience more frequent and longer delays to access the Olympic Gateway Plaza area under the proposed action because there is no alternate roadway access to the plaza area. However, there are two existing alternate options to access the Olympic Gateway Plaza area when train blocks grade crossings.

- A paved recreational path approximately 1 mile long and 8 feet wide extends from Morrison Riverfront Park immediately east of the Olympic Gateway Plaza to Junction City Road to the east, the grade crossing east of the Fleet Street entrance to the Olympic Gateway Plaza area. The path parallels the Chehalis River and the PS&P rail line.
- A paved trail approximately 750 feet long extends from the Aberdeen Hotel parking lot (located between East Heron Street [US 12 eastbound] and the PS&P rail line) to the west side of Walmart. The trail passes underneath the PS&P rail line Wishkah River bridge. This underpass is approximately 11 feet wide and 8.5 feet high.

These paths could provide alternate emergency vehicle access to the Olympic Gateway Plaza area and Morrison Riverfront Park when a train blocks all emergency vehicular access to the plaza area. Section 3.16.6.3, *Applicant Mitigation*, identifies applicant mitigation for emergency vehicle access to the Olympic Gateway Plaza area.

Port of Grays Harbor Area (Aberdeen)

Vehicular access west of Poynor Yard and south of the PS&P rail line is completely blocked on the existing roadways during train events. Section 3.15, *Rail Traffic*, illustrates the average and maximum duration that trains would occupy grade crossings in Aberdeen. Emergency vehicle access blockage under the proposed action would be affected in two areas, described as follows.

Between Poynor Yard and East of Port Industrial Road. West of Poynor Yard and east of Port Industrial Road are the Washington Street, Monroe Street, Heron Street, and Division Street crossings. Figures 3.15-4 and 3.15-5 illustrate the location of these grade crossings. Proposed action trains would block these crossings for a maximum of 51 minutes compared to between 4 and 8 minutes, depending on train type, under the no-action alternative. In addition, the frequency of crossing blockages would increase under the proposed action. Therefore, the grade crossings that provide emergency vehicular access to the industrial land uses west of Poynor Yard and south of the PS&P rail line would be completely blocked more frequently and for longer periods.

An unpaved road that parallels the south side of the PS&P rail line from the H Street crossing (east of Poynor Yard) could provide access to the industrial land uses south of the PS&P rail line in this area. Alternate access is also available through the State Route 520 (SR 520) construction site from East Terminal Road. Therefore, alternative routes can provide emergency vehicular access to the land uses immediately west of Poynor Yard and south of the PS&P rail line. Section 3.16.6.3, *Applicant Mitigation*, identifies applicant mitigation for emergency vehicle access to reduce the impact on emergency response to this area when a train blocks these grade crossings.

Between Port Industrial Road and the Project Site. All land uses south of the PS&P rail line between the Port Industrial Road crossing and the project site, including Home Depot and the Port of Grays Harbor, would be blocked from the land uses north of the PS&P rail line for approximately 58 minutes when a proposed action train arrives. The Port Industrial Road crossing would be the first grade crossing that would open to provide vehicular access to this area and would clear after approximately 58 minutes. This blockage of all grade crossings and the isolation of these land uses for approximately 58 minutes when a proposed action train arrives would substantially affect emergency response in this area. During this time, PS&P would be able to "cut" the train at Industrial Road to provide emergency response through Industrial Road; however, coordination would be required between PS&P and the emergency dispatch center. Section 3.16.6.3, *Applicant Mitigation*, identifies applicant mitigation to reduce the impact on emergency response to this area when a train blocks these crossings.

Vehicle Safety

Increased rail traffic related to the proposed action could increase the frequency of accidents along the PS&P rail line compared to the no-action alternative. The impacts on grade-crossing safety specific to each grade crossing for accidents involving trains and vehicles are summarized in Appendix L, *Vehicle Traffic Analysis*, which provides the total predicted accident rate, predicted intervals between accidents, and the decrease in years between the predicted intervals in the analysis year versus the no-action alternative for all the grade crossings along the PS&P rail line.

In 2017, the grade crossings that would have the shortest predicted intervals between accidents would be in Aberdeen, due to rail operations east of the Poynor Yard (Olympic Gateway Plaza area) and west of the Poynor Yard (Port of Grays Harbor area) that would increase frequency of train passbys at these crossings. These crossings include Industrial Road in the Port of Grays Harbor area, and the Dairy Queen and McDonalds driveways at the Olympic Gateway Plaza area. As with vehicle delay, accident frequencies would generally improve by 2037 for some crossings. This is due to improvements such as grade-crossing protections that are assumed to be implemented by 2037. Additionally, although infrastructure improvements considered for the East Aberdeen Mobility Project were not included in the safety analysis, any improvements would likely improve both delay and safety at crossings in the Olympic Gateway Plaza area.

The *Railroad-Highway Grade Crossing Handbook–Revised Second Edition* (Federal Highway Administration 2007) indicates that active devices with automatic gates should be considered when certain criteria are met. One criterion is if the expected accident frequency, as calculated by the U.S. Department of Transportation Accident Prediction formula, exceeds 0.075. As shown in Appendix L, *Vehicle Traffic Analysis*, no grade crossings would exceed this frequency using this formula. Therefore, using this threshold, no crossings under the no-action alternative would require consideration of automatic gates.

3.16.6 What required permits apply to vehicle traffic and safety?

No required permits or plans apply to vehicle traffic and safety.

3.16.7 What mitigation measures would reduce impacts on vehicle traffic and safety?

This section describes the applicant mitigation as well as other measures that would reduce vehicle traffic and safety impacts from construction and routine operation of the proposed action.

3.16.7.1 Applicant Mitigation

The applicant will implement the following mitigation measures.

- To mitigate vehicle traffic impacts associated with rail operations of the proposed action, the applicant will work with the City of Hoquiam, City of Aberdeen, Port of Grays Harbor, Grays Harbor Council of Governments, and PS&P to address vehicle delay and/or inform motorists of potential blockages at PS&P crossings between the project site and Poynor Yard. WSDOT, the City of Hoquiam, City of Aberdeen, and Port of Grays Harbor will approve proposed measures for the areas where they are responsible for vehicle delay. The applicant will ensure measures are in place prior to beginning the proposed operations. The proposed changes should include an evaluation of impacts on potentially affected low-income and minority populations.
- To mitigate vehicle traffic impacts associated with rail operations related to the proposed action, the applicant will work with the City of Hoquiam, City of Aberdeen, Port of Grays Harbor, Grays Harbor Council of Governments, and PS&P to address vehicle delays and/or inform motorists of potential blockages at PS&P grade crossings into and out of the Olympic Gateway Plaza. WSDOT, the City of Hoquiam, City of Aberdeen, and Port of Grays Harbor will approve proposed measures for the areas where they are responsible for vehicle safety. The applicant will ensure acceptable measures are in place prior to beginning the proposed project operations. The proposed changes should include an evaluation of impacts on potentially affected low-income and minority populations.
- To reduce the potential for increased delay of emergency vehicles at PS&P grade crossings during project operations, the applicant will work with local emergency service providers to provide advance notification of incoming trains.
- To ensure that local emergency service providers have access to areas south of the PS&P rail line in Aberdeen, the applicant will ensure that an emergency response vehicle with an 8-foot clearance is available and staged at the City of Aberdeen Fire Department. The applicant will also ensure a new combination pumper truck is available and staged at the City of Hoquiam's Eastside Fire Station to respond to incidents at the nearby project sites. These measures will be in place prior to beginning crude oil operations.
- To address the potential for emergency access conflicts to areas along the PS&P rail line during unplanned unit train stoppages, the applicant will work with PS&P and local emergency service providers along the PS&P rail line to develop and implement a notification protocol to inform local emergency service providers and other interested parties of the duration and magnitude of

the unplanned stoppages. The notification protocol will be in place prior to the beginning of operations involving transport of crude oil.

- To address potential vehicle safety impacts, each of the public at-grade crossings on the rail line, the applicant will work with PS&P to provide permanent signs that prominently display both a toll-free telephone number and a unique grade-crossing identification number in compliance with Federal Highway Administration regulations (23 Code of Federal Regulations 655). The toll-free number would enable drivers to promptly report any accidents, malfunctioning warning devices, stalled vehicles, or other dangerous conditions. The signs will be in place prior to the beginning of operations involving transport of crude oil.
- To address potential vehicle safety impacts, the applicant will coordinate with PS&P to make Operation Lifesaver educational programs available to communities, schools, and other organizations located along the rail line. Operation Lifesaver is a nationwide, nonprofit organization that provides public education programs to help prevent collisions, injuries, and fatalities at highway/rail grade crossings.

3.16.7.2 Other Measures to Be Considered

Overall, impacts of vehicle safety resulting from the proposed action are considered low; however, the following measures could further improve vehicle safety along the PS&P rail line.

- To improve vehicle delay and safety in East Aberdeen, the Grays Harbor Council of Governments should continue working with the appropriate jurisdictions and PS&P to evaluate options for improving existing congestion and delay, access, and safety issues along US 12 and the Olympic Gateway Plaza.
- To reduce the risk of an accident on the PS&P rail line, PS&P should work with local jurisdiction including WSDOT and the Washington Utilities Transportation Commission to ensure all of the public grade crossings meet Manual on Uniform Traffic Control Devices (23 U.S.C. 109(d)) guidance to include a yield or stop sign on every cross-buck post.
- To reduce the risk of an accident at grade crossings, PS&P should install flashers, gates, and/or cantilevers at crossings where warranted to improve vehicle and rail safety conditions. Begin to install these upgrades before initiating oil train traffic.
- To reduce the risk of an accident at grade crossings, PS&P should coordinate with applicable jurisdictions to ensure that trees, brush, and weeds are cleared from all grade crossings as far as possible to ensure clear lines of sight for all motorists approaching rail crossings.

3.16.8 Would the proposed action have unavoidable and significant adverse impacts on vehicle traffic and safety?

Implementation of the mitigation measures described above would reduce impacts on vehicle traffic but would not completely eliminate all vehicle delay impacts in Aberdeen. Therefore, the proposed action would have unavoidable and significant adverse impacts on vehicle delay in Aberdeen. As described in Section 3.16.5.2, *Proposed Action*, the vehicle delay would be most severe if a proposed action train were to pass by during the peak vehicle traffic hour. However, significant adverse impacts would also result from single events at grade crossings in the Olympic Gateway Plaza area and between Poynor Yard and the project site.

Three primary mechanisms would reduce vehicle delay at grade crossings: grade separation, grade crossing closures, and railroad infrastructure improvements, as explained below. None of these is a reasonable option to reduce grade-crossing delay.

- **Grade separation.** A grade separation is created when a bridge or underpass allows the roadway to pass over or under the rail line, completely separating vehicles from trains and therefore eliminating vehicle delay at the grade crossing. Grade separation is typically recommended for existing grade crossings when design thresholds are exceeded. Design thresholds look at the number of cars and trains traveling through the crossing, vehicle speeds, train speeds, the number and type of tracks, and the number of roadway lanes. Grade separation requires a substantial investment and can be disruptive to communities if businesses or homes adjacent to the intersection must be condemned or relocated. WSDOT estimates that creating grade separation in Washington State at a single crossing costs approximately $15 to $20 million. Because of the high cost of grade separation, the number of grade crossings in Aberdeen with substantial vehicle delay (at the Olympic Gateway Plaza and Port of Grays Harbor areas) and the private property and community impacts that would result from grade separation at the crossings with substantial vehicle delay, grade separation in Aberdeen is not a reasonable option to reduce vehicle delay.
- **Crossing closures.** While closing certain grade crossings could improve vehicle safety, closing crossings would worsen vehicle delay by diverting motorists to other grade crossings. This trip diversion would extend queue lengths at other grade crossings. Extended queue lengths would negatively affect vehicle delay. In addition, state and local governments do not have the authority to close rail crossings. For these reasons, closing grade crossings is not a reasonable option to reduce vehicle delay.
- **Railroad infrastructure improvements.** Vehicle delay could be reduced by adding new railroad infrastructure on the PS&P rail line. As discussed in Section 3.15, *Rail Traffic*, additional improvements to the PS&P infrastructure in Aberdeen have limited potential to reduce blocked crossing time substantially. However, PS&P infrastructure improvements between the Olympic Gateway Plaza and the project site could be explored further with regional stakeholders.

Addressing vehicle delay at the grade crossings at the Olympic Gateway Plaza area and between Poynor Yard and the project site would require the participation of a broad group of stakeholders in coordination with ongoing regional transportation planning efforts. For this reason, as listed in Section 3.16.7.2, *Applicant Mitigation*, the applicant will work with the City of Hoquiam, City of Aberdeen, Port of Grays Harbor, Grays Harbor Council of Governments, and PS&P to address vehicle delays and/or inform motorists of potential blockages at grade crossings into and out of the Olympic Gateway Plaza and between Poynor Yard and the project site. Measures to reduce vehicle delay could include modification of PS&P operations to limit switching activities during peak traffic hours, adding new PS&P infrastructure to reduce grade-crossing occupancy time, adding new queue storage capacity at grade crossings that exceed available storage length, or implementing an early warning system to provide advance information on train crossings to travelers and emergency service providers.

Ongoing regional solutions such as the East Aberdeen Mobility Project could reduce vehicle delay impacts and improve safety conditions at the Olympic Gateway Plaza area. In addition, further regional efforts to evaluate the potential improvements to reduce vehicle delay (such as grade separation, early-warning system, grade-crossing protections), would also help to reduce vehicle delay.

Implementation of the mitigation measures outlined above and in Chapter 4, *Environmental Health and Safety*, would reduce impacts on vehicle safety from increased rail operations on the PS&P rail line. There would be no unavoidable and significant impacts on vehicle safety.

3.17 Vessel Traffic

This section describes vessel traffic in the study area, including characteristics of Grays Harbor and the Grays Harbor Navigation Channel; vessel types, uses, and destinations; vessel traffic; and traffic management. It then describes impacts on vessel traffic that could result under the no-action alternative or as a result of the construction and routine operation[1] of the proposed action. Finally, this section presents any measures identified to mitigate impacts of the proposed action and any remaining significant and unavoidable impacts.

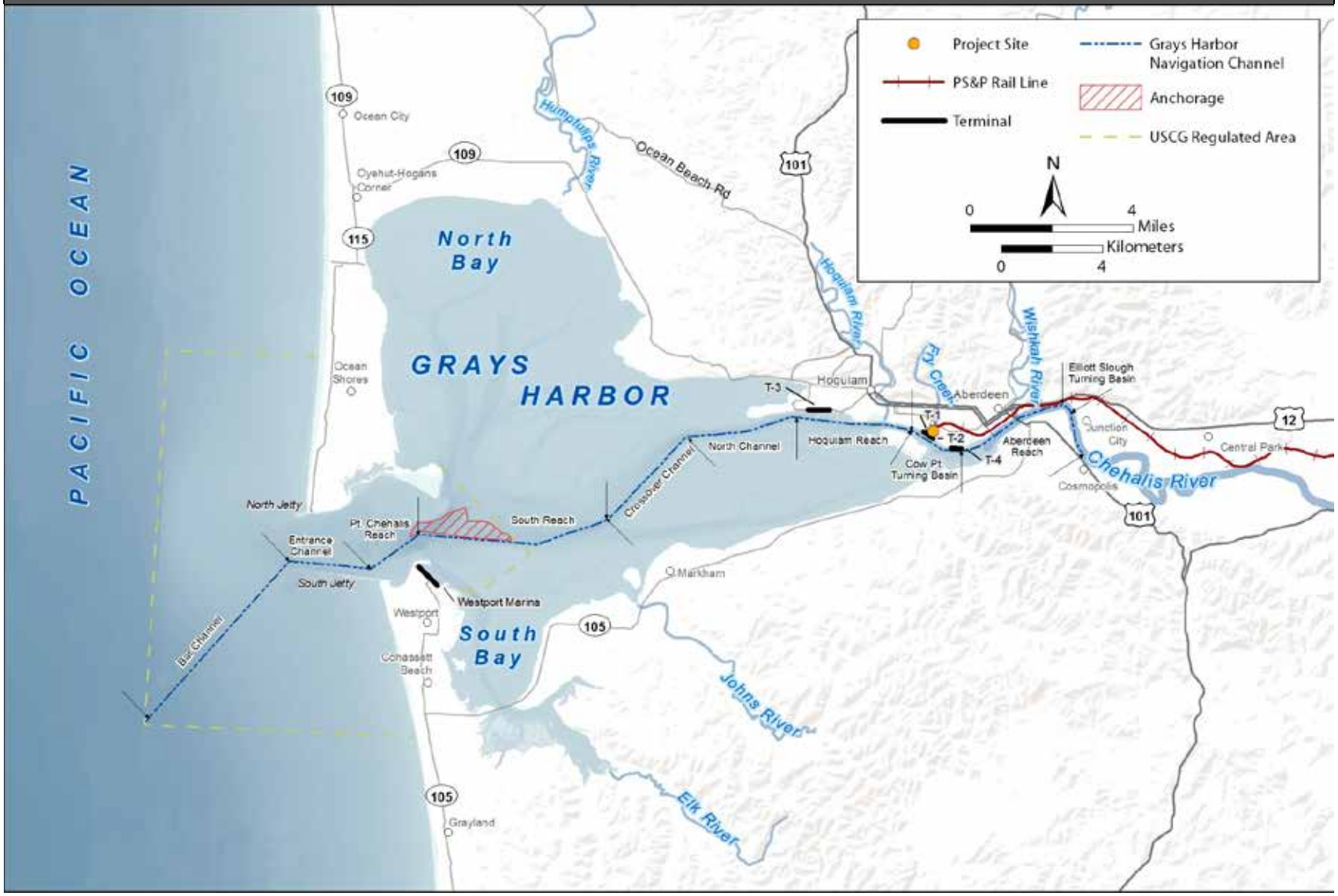
3.17.1 What is the study area for vessel traffic?

The study area for vessel traffic consists of the Terminal 1 berth and the entirety of Grays Harbor, including the navigation channel[2] into and out of the harbor out to 3 nautical miles from the mouth of the harbor (Figure 3.17-1). Chapter 5, *Extended Rail and Vessel Transport*, addresses impacts related to vessel transportation beyond this study area.

[1] Chapter 4, *Environmental Health and Safety*, addresses the potential impacts from increased risk of accidents (e.g., storage tank failure, train derailments, vessel collisions) and related consequences (e.g., release of crude oil or other proposed bulk liquids). Chapter 4 also addresses impacts related to vessel safety.

[2] The Grays Harbor Navigation Channel provides access for deep-draft vessels to Port of Grays Harbor facilities in the harbor. Nearly 23 nautical miles long, it begins approximately 4 miles offshore, runs in a predominantly easterly direction past Westport, Hoquiam, and Aberdeen, and ends at Cosmopolis near the mouth of the Chehalis River. The depth of the channel is maintained by the U.S. Army Corps of Engineers.

Figure 3.17-1. Port of Grays Harbor



3.17.2 What laws and regulations apply to vessel traffic?

Laws and regulations for determining potential impacts on vessel traffic are summarized in Table 3.17-1. More information about these laws and regulations is provided in Appendix B, *Laws and Regulations*.

Table 3.17-1. Laws and Regulations for Vessel Traffic

Laws and Regulations	Description
Federal	
Ports and Waterways Safety Act of 1972 (31 U.S.C. 1221 et seq.)	Authorizes USCG to provide for navigation and vessel safety; protect the marine environment; and protect life, property, and structures in, on, or immediately adjacent to the navigable waters of the United States.
Port and Tanker Safety Act of 1978 (33 U.S.C. 1221 et seq.)	Grants USCG broad and extensive authority to supervise and control all types of vessels, foreign and domestic, operating in U.S. navigable waters.
Navigation and Navigable Waters, Subchapter E: Inland Navigation Rules (33 CFR 83–90)	Apply to all vessels on the inland waters of the United States and complement the International Regulations for Preventing Collisions at Sea 1972, which are applicable in International Waters.
Federal Pilotage Requirements (46 CFR 15.610 and 15.812)	Identifies the type of vessels that require a federally licensed master or mate and identifies federal pilotage requirements for U.S.-inspected vessels on coastwise voyages.[a]
State	
Washington State Pilotage Act (RCW 88.16)	Establishes requirements for compulsory pilotage provisions in certain waters of the state, including Grays Harbor.
Local	
No local laws or regulations apply to vessel traffic.	

[a] A coastwise voyage by sea is a voyage in which a U.S.-flagged vessel proceeds from one port or place in the United States to another port or place in the U.S. while engaged in trade (46 CFR 46.05-15).

U.S.C. = United States Code; USCG = U.S. Coast Guard; CFR = Code of Federal Regulations; RCW = Revised Code of Washington

3.17.3 How were impacts on vessel traffic evaluated?

This section describes the sources of information and methods used to evaluate impacts.

3.17.3.1 Information Sources

Information about vessel traffic in the study area, including characteristics of Grays Harbor and the navigation channel; vessel types, uses, and destinations; vessel traffic; and traffic management was obtained from the following sources.

- *Vessel Traffic Impact Analysis for Westway and Imperium* (WorleyParsons 2014).
- Nautical charts and data on observed water levels at tidal station 9441102 in Westport, Washington (National Oceanic and Atmospheric Administration 2014a).
- National Oceanic and Atmospheric Administration. 2014b. *U.S. Coast Pilot 7 Pacific Coast*. 2014 (46th Edition). August 31, 2014.

- U.S. Army Corps of Engineers (USACE) Waterborne Commerce Statistics Center (U.S. Army Corps of Engineers 2014b).
- *Navigation Improvement Project General Investigation Feasibility Study, Grays Harbor, Washington* (U.S. Army Corps of Engineers 2014).
- *Washington State 2014 Marine and Rail Oil Transportation Study* (Washington State Department of Ecology 2014, 2015).
- Laws and regulations granting the U.S. Coast Guard (USCG) authority to provide for navigation and vessel safety in navigable waters of the United States.
- *Harbor Safety Plan for Grays Harbor* (Grays Harbor Safety Committee 2014).
- Personal communication with Port of Grays Harbor (Port) pilots and staff
- Information on commercial, recreational, and tribal fishing obtained from the Washington Department of Fish and Wildlife and Quinault Indian Nation.

3.17.3.2 Impact Analysis

The vessel traffic analysis evaluated the capacity of the navigation channel, Terminal 1 berth, and pilot and escort tugs relative to the increase in large commercial vessel trips under the proposed action, and potential conflicts of these vessels with smaller recreational and fishing vessels in the harbor.

- **Channel capacity.** The channel capacity analysis was completed by first determining existing and future traffic related to large commercial vessels[3] over the 20-year analysis period (2017 to 2037) without the proposed action. Future vessel traffic was determined by applying moderate compound annual growth rates to vessel trips associated with the present commodity volumes shipped from the Port. The growth rates used for commercial product forecasts were 1.2% for forest products (including wood chips), 0.7% for food and farm products, 3.9% for manufactured equipment (machinery and auto), and 6.8% for chemicals (e.g., methanol). Forecast volumes of vegetable oil and biofuels were kept constant.

  The channel capacity analysis compared forecast vessel trips to the navigable windows available for these vessels to assess whether the capacity of the navigation channel would be exceeded on an annual basis with the addition of traffic anticipated under the proposed action. The channel capacity analysis considered a mix of vessel types for transport of bulk liquids under the proposed action and channel capacity constraints under three channel depth scenarios.
- **Berth capacity**. The berth capacity analysis compared berth occupancy at Terminal 1 under the proposed action to berth availability.
- **Pilot and escort tug capacity.** The pilots and escort tug analysis was completed by qualitatively assessing whether the potential increase in demand for state-licensed pilots and escort tugs could be met with the pilots and tugs currently under contract with the Port.
- **Conflicts with recreational and fishing vessels.** Potential conflicts of large commercial vessels with smaller recreational and fishing vessels in the harbor were evaluated by determining the

[3] The channel capacity analysis considers the large commercial vessels, which are restricted to the navigation channel due to the depth of their drafts.

extent of traffic related to these smaller vessels in the harbor (number of vessels, nature, geographic extent, and timing of operations) and qualitatively assessing the extent of the disruption to these vessel operations because of large commercial vessel traffic within the navigation channel.

3.17.4 What vessel traffic currently occurs in the study area?

Vessel traffic in the study area includes a mix of large commercial vessels and smaller fishing (commercial, tribal, and recreational) and recreational vessels. Depending on the type of operation, the vessel traffic in the study area varies in intensity, both geographically and seasonally. This section describes existing vessel traffic and navigational considerations, including the vessel traffic management system.

3.17.4.1 Grays Harbor

Grays Harbor is a large, naturally formed bay on the west coast of Washington State. It is an estuary fed by multiple rivers and creeks, the most significant being the Chehalis River. Offshore, extending approximately 2 miles from the mouth of the bay is an entrance bar[4] composed of sand and silt, which is subject to the effects of tide, current, and ocean forces. The bay enclosed in Grays Harbor is filled by many shoals[5] and flats, some of which are bare at low water and are cut by numerous channels. Grays Harbor experiences semidiurnal tides, meaning that it has two uneven tidal cycles each day (two high tides and two low tides). The harbor has two jetties at its entrance approximately 1.17 nautical miles (7,120 feet) apart (Figure 3.17-1). The two jetties were originally constructed from 1889 to 1913 for harbor navigation.

The entrance bar, coupled with strong and sometimes erratic currents, can present a navigational challenge to vessels entering or leaving Grays Harbor. Periods of limited visibility due to fog, rain, or darkness can add to this challenge. Submerged sections of the north and south jetties at the harbor entrance extend seaward about 0.2 and 0.9 mile, respectively. Hazardous breakers can occasionally be present near these jetties, especially during periods of heavy weather (National Oceanic and Atmospheric Administration 2014b:459).

Figure 3.17-1 shows the navigation channel through Grays Harbor and out to the Pacific Ocean, identifying individual reaches and Port terminals.

3.17.4.2 Large Commercial Vessels

Large commercial vessels traveling in Grays Harbor call at facilities maintained by the Port or at privately owned wharfs located farther east (Figure 3.17-2). Bulk exports (especially shipments of grain, soybeans, and other agricultural products) are the largest volume of commodity handled at Port facilities (Washington State Department of Ecology 2015). The Port terminals, terminal operators, vessels, and products transported are described below (Grays Harbor Safety Committee 2014:9; National Oceanic and Atmospheric Administration 2014b:462; U.S. Army Corps of Engineers 2012:74, 156).

[4] A bar is a large mass of sand or earth, formed by the surge of the sea. Bars located at the entrance of a harbor often render navigation extremely dangerous, but confer tranquility once inside.

[5] Shoals are an accumulation of sand and silt that reduce the depth of the navigation channel for transiting vessels.

- Terminal 1 is a bulk liquid storage and marine and rail transfer facility. It has one deepwater berth and access to the Puget Sound & Pacific Railroad (PS&P) rail line. The applicant and Westway Terminal Company LLC receive tank vessels transporting bulk liquids.
- Terminal 2 is a loading facility for both dry and bulk liquid products and is served by the Port's loop track. Ag Processing, Inc. receives dry-cargo vessels transporting bulk agricultural materials (e.g., grain) and Dkoram and Willis Enterprises receive dry-cargo vessels transporting wood products.
- Terminal 3 is a 150-acre industrial site with vessel and rail access. This terminal is currently unoccupied; it the proposed site of a Grays Harbor Rail Terminal development.
- Terminal 4 is the largest of the four terminals. It is a storage and transfer facility with two deepwater berths and on-dock rail service. Terminal 4 serves as the primary terminal for automobiles and bulk cargo. It is currently operated by Siem Car Carriers and Pasha Group.

Most of the large commercial vessels operating in Grays Harbor comprise the following types of vessels.

- **Tank vessels** carry bulk liquids, including oil, methanol, nontoxic vegetable oils, and biodiesel. They consist of self-propelled **tankers** and **tank barges** that require an escort tug.
- **Cargo vessels** carry grain, wood, and other dry projects. They consist of self-propelled **cargo ships**, **cargo barges** that require an escort tug, and **RoRo vessels** (roll-on/roll-off) that carry wheeled vehicles (Figure 3-17-3). In this document, the term *cargo vessel* refers to vessels carrying dry cargo only (not liquid cargo).

All of the large commercial vessels, except for the cargo barges, are considered deep-draft[6] vessels. Because of their draft depths, these vessels are restricted in their ability to maneuver in Grays Harbor area and are limited to transit in the navigation channel and at the Port terminal berths. The shallower-draft cargo barges are not restricted to the navigation channel and can travel to locations at the mouth of the Chehalis River and further upstream (see Section 3.17.5.2, *Proposed Action,* for further discussion of typical tank vessels and their design drafts).

[6] Vessel draft is the vertical distance between the water line and the bottom of the vessel.

Figure 3.17-2. Sources of Large Commercial Vessel Activity in the Study Area

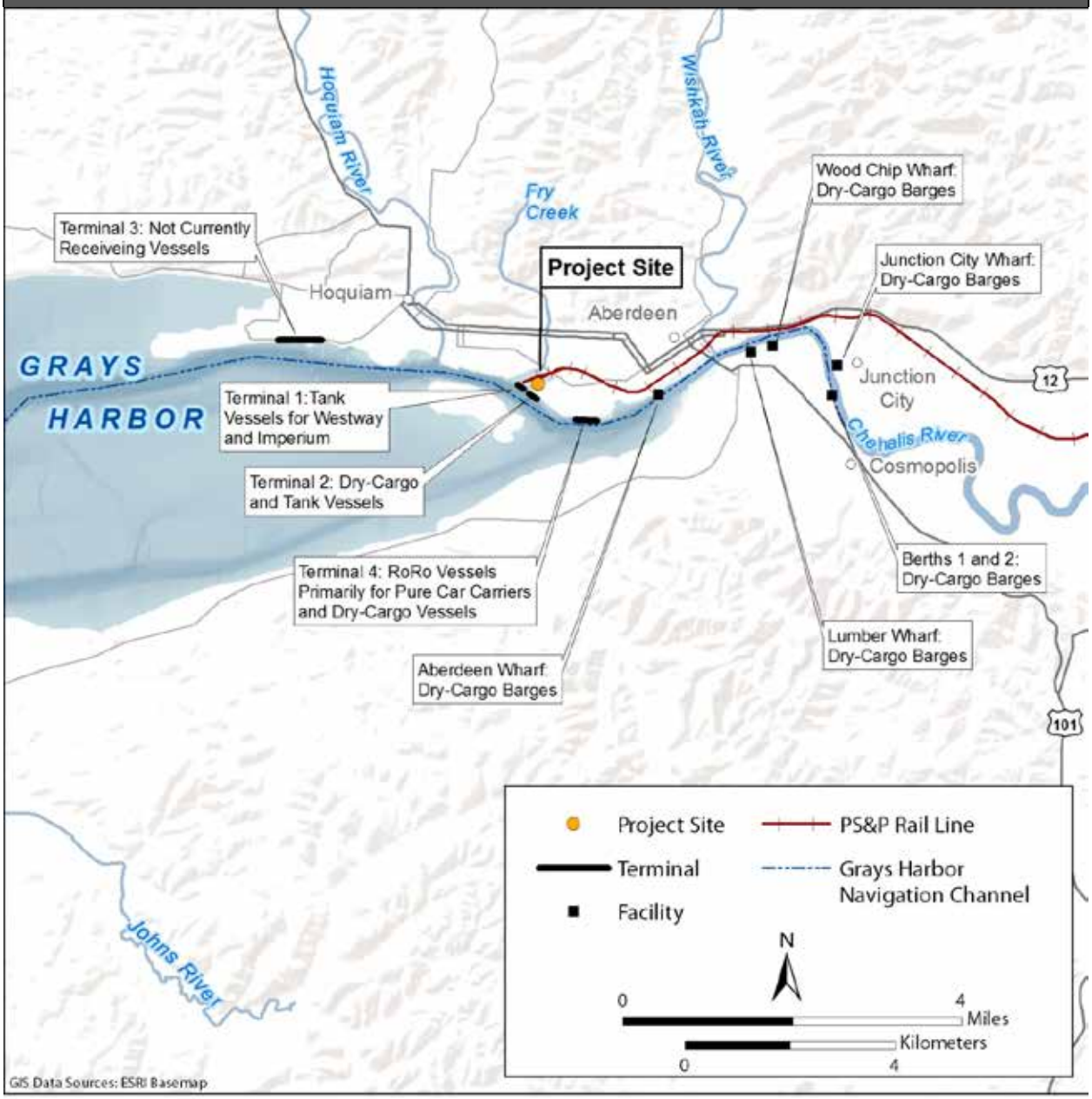


Figure 3.17-2
Sources of Vessel Activity in Grays Harbor

Figure 3.17-3. Typical Large Commercial Vessels Using Grays Harbor

Tanker
Primary use: bulk liquid transfer
Deadweight tonnage: 53,100 metric tons
Capacity: 320,000 barrels
Length: 612 feet; Breadth: 106 feet

Tank Barge
Primary use: bulk liquid transfer
Deadweight tonnage: 20,000 metric tons
Capacity: 155,000 barrels
Length: 604 feet; Breadth: 75 feet

Cargo Ship
Primary use: dry bulk cargo
Deadweight tonnage: 43,000 metric tons
Length: 656 feet; Breadth: 105 feet

Cargo Barge
Primary use: dry bulk cargo
Deadweight tonnage: 11,000 metric tons
Length: 512 feet; Breadth: 85 feet

RoRo Vessel (Cargo Ship)
Primary use: automobiles
Deadweight tonnage: 11,760 metric tons
Length: 600 feet; Breadth: 103 feet

Commercial Fishing Vessel
Primary use: fishing
Deadweight tonnage: 100–2,000 metric tons
Length: 82–262 feet; Breadth: 20–40 feet

Source: WorleyParsons 2014

Large Commercial Vessel Operations

This section describes the operational considerations relevant to large commercial vessels in the study area.

Vessel Operator and Crew Responsibilities

The vessel operator is responsible for scheduling—in advance of the vessel arriving at the Port—all activities associated with navigation, berthing, vessel safety, and security while in Grays Harbor. The vessel operator procures the state-licensed pilot through the Port consistent with applicable federal and state regulations, if required (Federal Pilotage Requirements 46 Code of Federal Regulations [CFR] 15.610 and 16.812 and Washington State Pilotage Act Revised Code of Washington [RCW] 88.16). The role of the Port, pilots, and the Port's tenants and vessel agents in facilitating large commercial vessel traffic in Grays Harbor is further described in Section 3.17.4.4, *Vessel Traffic Management*.

The vessel operator also contracts with an approved ship's stevedore[7] to handle the vessel side of the operations during vessel loading and unloading. The ship's crew handles all of the underway tasks, including berthing and departure activities, under the direction of the pilot and or ship's master. The crew is also responsible for maintaining the anchor watch when a vessel is anchored in Grays Harbor. When the incoming or outgoing vessel is a laden tank barge, it is escorted by a tug according to harbor safety guidelines; the escort tug's captain brings the vessel all the way to the terminal. A Grays Harbor pilot is not required when the arriving or departing vessel is a tank barge on a coastwise voyage, but a pilot is typically employed (WorleyParsons 2014).

Escort Tug Services

The Port provides various services such as pilotage, ship assistance (with escort tugs), line handling, and terminal stevedoring (WorleyParsons 2014) to large commercial vessels operating in the study area. The Port has a contract with Brusco Tug & Barge through 2016 for tug escorting and docking services; the contract specifies requirements for bollard strength and engine capacity. Brusco Tug & Barge has three harbor tugs stationed in Grays Harbor that are exclusively available for commercial vessel assistance in the harbor. These three tugs manage the escorts required for the current numbers and types of commercial vessels transiting Grays Harbor. Two of the escort tugs are Z-drive tugs,[8] which are highly maneuverable. Each has a towing power of over 100,000 pounds and a fire monitor. One of these two tugs has an installed tank to carry foam for spraying from the fire monitor, if necessary. The third tug is a highly maneuverable ship-assist tug (Campbell pers. comm.) The Z-drive tugs are capable of leaving Grays Harbor to assist a disabled or damaged vessel at sea.

The existing emergency response towing vessel at Neah Bay, located at the far northwest corner of Washington State, is available to assist vessels off the coast of Washington and in Puget Sound. It could assist with vessels in a difficult situation in or near Grays Harbor; however, under normal weather conditions, it could take an average of 12 hours to reach the harbor. Under adverse weather conditions, transit time to Grays Harbor could be as much as 18 hours.

[7] Stevedores (longshore workers) connect hoses for bulk liquid transfer operations and provide assistance for vessels at the terminal.
[8] A Z-drive tug is so named because of the appearance of the mechanical transmission used to connect the driving energy to the thruster device.

Anchorage Areas

Incoming vessels may be anchored near the entrance to Grays Harbor while awaiting a vessel to leave Terminal 1 or to transit through the navigation channel. Vessels may also be anchored after loading if entrance bar conditions are not suitable for immediate transit seaward. Vessel anchorage areas are located just inside the harbor, as shown on Figure 3.17-1.

Anchorage areas available in Grays Harbor for commercial vessels are frequently reevaluated and assigned through a joint effort assessment by the pilots, USCG, and USACE. The pilots and USCG monitor conditions at the anchorage areas based on their daily observations while navigating Grays Harbor and the continuously updated sounding data for Grays Harbor and its navigation channel, which they receive from USACE (WorleyParsons 2014). The current deep-draft vessel anchorage areas can accommodate three large deep-draft vessels with adequate capacity for the vessel to swing on the anchor in response to wind or currents (D'Angelo pers. comm.). The Grays Harbor Safety Plan includes standards of care for anchorage operations (Grays Harbor Safety Committee 2014).

Grays Harbor Navigation Channel

The navigation channel provides access for deep-draft vessels to Port facilities in the harbor. Nearly 23 nautical miles long, it begins approximately 4 miles offshore, runs in a predominantly easterly direction past Westport, Hoquiam, and Aberdeen, and ends at Cosmopolis near the mouth of the Chehalis River. The bar area outlined by yellow lines in Figure 3.17-1 is the Regulated Navigation Area established by USCG. Grays Harbor has a complex navigation route due to the bar at the entrance, a constrained channel, and limited depth. Constrained by shoals and flats, the navigation channel narrows to 0.6 mile wide with a number of turns where course changes are required (Washington State Department of Ecology 2015). USACE is responsible for maintaining the navigation channel by periodically dredging and removing obstructions. The depths at which USACE maintains the channel reaches are referred to as project depths. Because of shoaling, actual channel depths may vary considerably from project depths between maintenance dredging. Shoaling in the middle of the channel restricts a vessel's draft, while shoaling along the edges of the channel can affect vessel squat[9] and the ability of vessels to pass in the channel. The following sections describe the terms used for channel depths in this analysis.

The following navigation rules (Inland Navigation Rules, Rules 9, 13, and 18) apply to the navigation channel, which gives tankers and tank barges the right-of-way within the channel (WorleyParsons 2014).

- A vessel of less than 20 meters in length, a sailing vessel, or a vessel engaged in fishing shall not impede the passage of any other vessel navigating within a narrow channel or fairway.
- A vessel shall not cross a narrow passage or fairway if such crossing impedes the passage of a vessel that can safely navigate only within such channel or fairway.
- In a narrow channel or fairway, any overtaking has to be permitted by the vessel being overtaken.

[9] Vessel squat is the tendency of a vessel to draw more water astern (i.e., behind or toward the rear of the vessel) when it is moving through a water body. The streamlines of return flow are speeded up under the ship. This causes a drop in the pressure, resulting in the ship dropping vertically in the water and, effectively, increasing draft.

- All sailing, fishing vessels and power-driven vessels shall keep out of the way of a vessel restricted in her ability to maneuver.

2014 Controlling Depths

The National Oceanic and Atmospheric Administration is responsible for maintaining navigational charts. Periodic surveys by USACE and the National Oceanic and Atmospheric Administration determine the actual or *controlling* depth of water in the navigation channel at the time of the survey. Controlling depths are the depths that dictate the maximum draft of vessels (based on the minimum depths of the water). Controlling depths for each reach (section) of the navigation channel, based on surveys from December 2013 and corrected through August 2014, are presented in Table 3.17-2. According to the latest surveys, there is a substantial difference between the project or design depth (described below) of the navigation channel and the actual surveyed depth, referring to as controlling depth, in some reaches.[10] Based on the latest surveys, the Crossover Channel Reach, with a controlling depth of 27 feet mean lower low water (MLLW), is currently limiting vessel draft in Grays Harbor. Therefore, 27 feet MLLW represents the 2014 controlling depth.

2014 Project Depth

Each reach (section) of the navigation channel has project dimensions (depth, width, height), as authorized by Congress. Project dimensions for each reach of the navigation channel are presented in Table 3.17-2. Project depths range from 46 feet MLLW in the Bar Channel Reach to 36 feet MLLW in the North Channel, Hoquiam, and Cow Point Reaches. Vessels traveling between the Bar Channel Reach and terminals are limited by the shallowest reach of the navigation channel. Therefore, 36 feet MLLW represents the 2014 project depth.

[10] For example, a controlling channel depth of 27 feet mean lower low water (MLLW) in the middle half of the Crossover Channel Reach of the navigation channel (Table 3.17-2) is 9 feet less than the federally authorized project depth of 36 feet MLLW. Controlling depths in the middle half of the North Channel and Hoquiam Reaches of the navigation channel (Figure 3.17-1) are 6 feet and 4 feet less than the project depth, respectively.

Table 3.17-2. Port of Grays Harbor Navigation Channel Controlling Depths and Project Dimensions

	Controlling Depths at MLLW (feet)			Project Dimensions		
Channel Reach	Left Outside Quarter	Middle Half	Right Outside Quarter	Width (feet)	Length (nautical miles)	Depth MLLW (feet)
Bar Channel	45	46	46	1,000	4.6	46
Entrance Channel	35	41	30	900–600	1.8	42
Pt. Chehalis Reach	37	35	28	600	1.2	40
South Reach	29	35	35	600–350	4.1	36
Crossover Channel	22	27	23	350–450	2.5	36
North Channel	27	30	23	450–350	2.4	36
Hoquiam Reach	19.	32	26	350	1.9	36
Cow Point Reach	24	36	33	350–900	1.8	36
Aberdeen Reach	18	22	26	550–200	2.6	32
Turning Basin	30	29	23	200–550	0.3	32
Thence to Cosmopolis	23	25	27	200	0.8	32

MLLW = mean lower low water

2017 Project Depth

The USACE Seattle District recently completed a General Investigation Feasibility Study (U.S. Army Corps of Engineers 2014a:21) at the request of the Port to investigate deepening the navigation channel to a legislatively authorized depth of 38 feet MLLW. The project would deepen the navigation channel to a new project depth of 38 feet MLLW between South Reach and Cow Point Reach. Dredging for channel deepening is anticipated to occur between 2016 and 2017. Upon completion of the project, the limiting depth for the transit between the Bar Channel Reach and Port terminals would be 38 feet MLLW. Therefore, 38 feet MLLW represents the 2017 project depth.

Channel Depth Constraints

Channel depth constraints must be considered when large commercial vessels navigate the channel. Pilots are responsible for knowledge of local conditions, including channel depth and tides, and must account for changes in conditions when guiding vessels through the harbor. Vessel operators planning to transit Grays Harbor must consider many factors when planning arrival times to ensure there is sufficient water under the ship's keel[11] at all times to keep the vessel from touching the bottom. To prevent vessel grounding, the pilot and vessel operator must know the vessel's maximum draft (accounting for vessel squat), margins of safety for under-keel clearance, and the anticipated depth of the water in the navigation channel (based on charted depths and tidal corrections). Each of these considerations is discussed further below.

Vessel Draft

Vessel draft is the vertical distance between the water line and the bottom of the keel (Figure 3.17-4). Drafts for large commercial vessels vary depending on the vessel and degree that

[11] The keel runs in the middle of the ship, from the bow to the stern and serves as the primary source of structural strength of the hull.

the vessel is loaded or in ballast.[12] Cargo vessels tend to have a deeper draft than cargo barges. Tankers such as the Panamax-size vessels accommodated in Grays Harbor tend to have a deeper draft than tank barges. In addition to vessel type, vessel loading is a primary determinant of vessel draft, with fully or partially loaded vessels having deeper drafts than empty vessels.

Vessel Squat

Vessel squat describes the tendency of a ship to sink vertically toward the seabed when it is moving through shallow water or a channel. Vessel squat increases the draft of the vessel and reduces under-keel clearance. Figure 3.17-4 shows that at 0 feet of tide height, a deep-draft vessel actually has less under-keel clearance due to squat as the vessel moves through the navigation channel. The effect of squat in the figure is represented by a 1-foot vertical drop and an overall reduction in under-keel clearance by that same amount. Ship speed is a main factor for vessel squat.

Under-Keel Clearance

Under-keel clearance is the vertical distance between the deepest point of the vessel's hull and the seabed (Figure 3.17-4). When entering Grays Harbor, an under-keel clearance of 10% after squat is recommended to ensure sufficient water under the keel and reduce the risk of vessel grounding (D'Angelo pers. comm.). For example, if the vessel's maximum draft is 33 feet, an additional 3.3 feet of water should be maintained under the keel, meaning the channel depth would need to be no less than 36.3 feet deep to accommodate safe passage of the vessel.

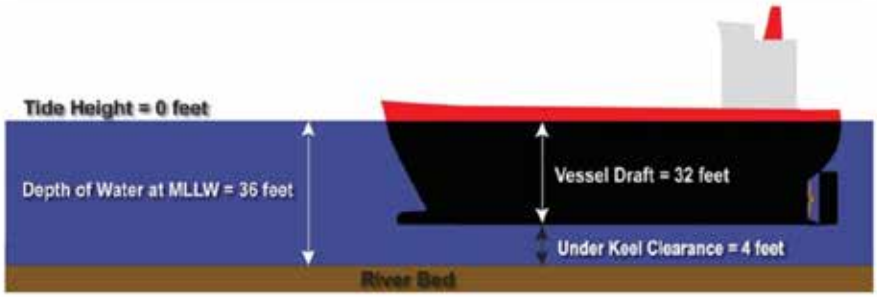
Tidal Influences on Channel Depth

Grays Harbor experiences two high tides and two low tides each day of different heights. Water depth on the charts (nautical maps) and surveys for the west coast is referenced in terms of MLLW[13]. To determine the depth of water available at any given time, the calculated height of the tide is added to the number listed on the chart. For example, if the chart lists the depth at 36 feet and the current height of the tide is 5 feet, the depth of water at that time and place would be 41 feet. Figure 3.17-4 shows that when a vessel with 32 feet of draft transits a channel that is 36 feet deep during a tide height of 5 feet, there are 9 feet of clearance under the keel. Because the tide is in a near-constant state of ebb and flow, the pilot and vessel operator must plan the vessel transit with knowledge of the level of the tide at all points along the intended route.

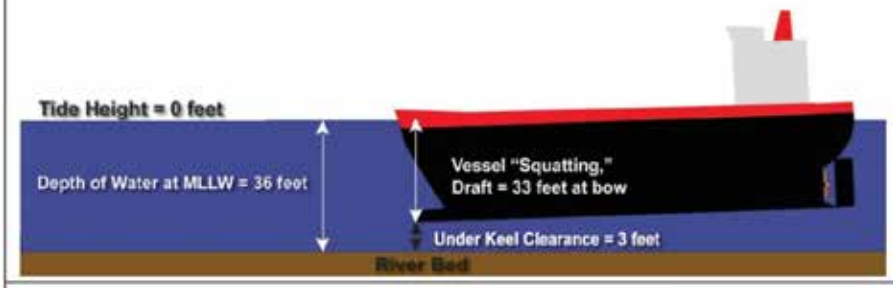
[12] Vessels *in ballast* have had their tanks loaded with seawater to increase vessel stability.

[13] Mean lower low water (MLLW) is the average of the lower low water height of each tidal day observed over the National Tidal Datum Epoch. The number of navigable windows available at a tidal elevation equal to or more than 8 feet includes windows available at tidal elevations equal to or more than 9 and 10 feet. Therefore, the number of navigable windows declines with increasing tidal elevation. While an estimated 1,627 navigable windows per year occur when the tide is 4 or more feet MLLW, only an estimated 21 navigable windows per year occur when the tide is 10 or more feet MLLW.

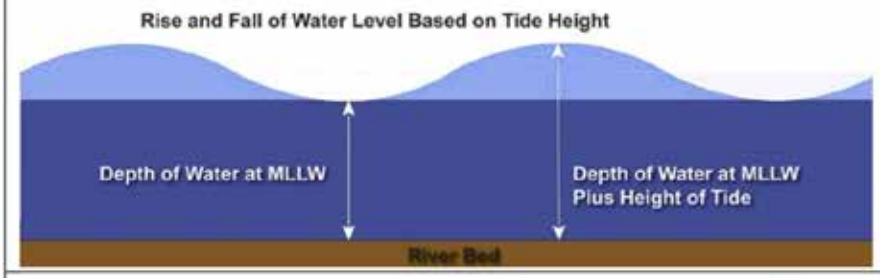
Figure 3.17-4. Example of Factors Affecting Under-Keel Clearance



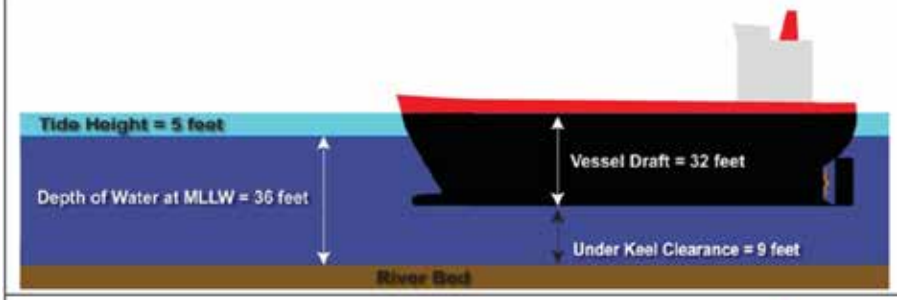
If the vessel has a 32-foot draft, the channel is at project depth of 36 feet MLLW, and tide is at 0 feet, under-keel clearance is 4 feet.



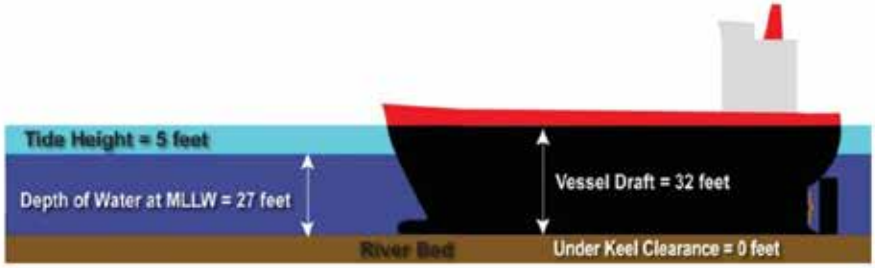
This vessel is squatting. It is down 1 foot at the bow, reducing under-keel clearance to 3 feet.



To determine the depth of water available at any given time, the calculated height of the tide is added to the charted depth.



If a vessel has a 32-foot draft, the channel is ai project depth of 36 feet MLLW, and tide is at 5 feet, under-keel clearance is 9 feet.



In the Crossover Channel, channel depth is 27 feet MLLW. A vessel with 32-foot draft will run aground at tides under 5 feet.

Navigable Windows and Maximum Vessel Draft

Entry into Grays Harbor by large commercial vessels is scheduled and arranged by the Port and pilots. Pilots consider factors such as tides, weather, channel depth, pier availability, and vessel type when preparing to enter a port. It takes approximately 2 hours for vessels to transit the navigation channel between the entrance buoy (3 nautical miles outside the channel) and Terminal 1. As stated above, Grays Harbor experiences two high tides and two low tides each day of different heights. According to the U.S. Coast Pilot 7, the mean rise of the tide in Grays Harbor is about 9 feet (National Oceanic and Atmospheric Administration 2014b:259).[14]

Transit by deep-draft vessels through the navigation channel is typically planned when tidal elevations are close to high tides. This provides an additional measure of safety because the distance between the bottom of the ship and the bottom of the channel is greater. Pilots scheduled most deep-draft vessel transits (between 74 and 94% over 8 years, from 2005 to 2012) through the navigation channel when tidal elevations were at 5 feet or above MLLW (U.S. Army Corps of Engineers 2014a:21).

Table 3.17-3 summarizes the number of 2-hour windows, referred to as navigable windows, available at tidal elevations between 4 and 10 feet, based on monthly tidal data for 2012 for the Westport tidal station (National Oceanic and Atmospheric Administration 2014c).

Table 3.17-3. Number of Navigable Windows per Year by Tidal Elevation

	Tidal Elevation (feet MLLW)						
	≥4	≥5	≥6	≥7	≥8	≥9	≥10
Navigable windows per year[a]	1,627	1,274	904	593	298	102	21

[a] Navigable (2-hour) windows are cumulative. For example, the number of navigable two-hour windows available at a tidal elevation of ≥8 feet, includes windows available at tidal elevations ≥9 feet and ≥10 feet.
MLLW = mean lower low water

Table 3.17-4 describes limitations on vessel draft during transit through the navigation channel at tidal elevations between 4 and 10 feet, under three channel depth scenarios.

- 2014 controlling depth: 27 feet MLLW
- 2014 project depth: 36 feet MLLW
- 2017 project depth: 38 feet MLLW

Channel depth is the primary limitation for transiting deep-draft vessels, because it establishes the maximum depth of water available within the range of tidal elevation. For each combination of tidal elevation and channel depth, the depth of water available in the channel is calculated, as well as the maximum vessel draft that could transit the channel. The estimated maximum vessel draft able to transit the channel is conservative, and accounts for tidal influences, vessel squat, and a 10% margin of safety for under-keel clearance, as described above in *Channel Depth Constraints.* Actual maximum vessel draft able to navigate the channel at each channel depth and tidal elevation may vary from

[14] To estimate the frequency that vessels with varying drafts would be able to navigate the channel under different channel conditions, the number of navigable windows and maximum vessel draft were estimated for each tidal elevation between 4 and 10 feet above MLLW, using 2012 tidal heights.

what is described in Table 3.17-4, depending on actual channel conditions at the time of transit and specifications of the transiting vessel.

Table 3.17-4. Maximum Vessel Draft by Tidal Elevation and Channel Depth

	Tidal Elevation (feet)						
Channel Condition	**≥4**	**≥5**	**≥6**	**≥7**	**≥8**	**≥9**	**≥10**
2014 Controlling Depth (27 feet MLLW)							
Water depth (feet)[a]	31	32	33	34	35	36	37
Maximum vessel draft (feet)[b]	27	28	29	29.5	30	31	32
2014 Project Depth (36 feet MLLW)							
Water depth (feet)[a]	40	41	42	43	44	45	46
Maximum vessel draft (feet)[b]	35	36	37	38	39	39.5	40
2017 Project Depth (38 feet MLLW)							
Water depth (feet)[a]	42	43	44	45	46	47	48
Maximum vessel draft (feet)[b]	37	38	39	39.5	40	41	42

[a] Water depth equals the channel depth at MLLW + tidal elevation.
[b] Maximum vessel draft accounting for vessel squat and a 10% margin of safety for under-keel clearance.
MLLW = mean lower low water

These tables show that as vessel draft increases, the number of navigational windows available for transiting Grays Harbor decreases. For example, at the current controlling depth, vessels with a 32-foot draft require a tidal elevation of 10 feet or more. This amount of water is available only 21 times a year. However, pilots may find greater flexibility at the time of navigation, based on current conditions and expert knowledge of local waters.

Under the 2014 project depth of 36 feet MLLW or 2017 project depth of 38 feet MLLW, maximum vessel draft at each tidal elevation increases (Table 3.17-4), providing more navigable windows for deeper-draft vessels.

Large Commercial Vessel Traffic

Recent trends in large commercial vessel traffic at the Port were considered over a 5-year period from 2008to 2012 (U.S. Army Corps of Engineers 2014b). Over this period, there were a total of 1,448 cargo vessel trips and 67 tank vessel trips.[15]

Table 3.17-5 details annual cargo vessel trips by vessel draft. Over this 5-year period, cargo barge trips declined by 77%, while cargo ships trips roughly doubled.

[15] A trip represents one-way travel; in other words, an inbound trip and an outbound trip are counted as two trips.

Table 3.17-5. Distribution of Cargo Vessel Trips by Vessel Draft (2008–2012)

Vessel Draft (feet)	Cargo Barge Trips						Cargo Ship Trips[a]					
	2008	2009	2010	2011	2012	Total	2008	2009	2010	2011	2012	Total
0–5	209	103	89	145	37	583	0	0	0	0	0	0
6–9	16	3	0	3	5	27	2	0	0	0	12	14
10–12	37	30	28	15	16	126	3	0	0	0	27	30
13–14	18	6	9	10	10	53	26	8	0	0	10	44
15–17	12	2	0	0	0	14	2	0	1	0	0	3
18–20	0	0	0	0	0	0	12	8	19	12	6	57
21–23	0	0	0	0	0	0	18	22	27	12	28	107
24–26	0	0	0	0	0	0	2	13	24	32	31	102
27–29	0	0	0	0	0	0	7	6	15	28	40	96
30–32	0	0	0	0	0	0	10	6	20	10	14	60
33–35	0	0	0	0	0	0	18	12	15	13	11	69
36–38	0	0	0	0	0	0	5	10	10	6	15	46
39–40	0	0	0	0	0	0	0	1	1	2	13	17
Total	**292**	**144**	**126**	**173**	**68**	**803**	**105**	**86**	**132**	**115**	**207**	**645**

Source: U.S. Army Corps of Engineers 2014b

[a] This source uses the term *dry-cargo;* includes RoRo vessels.

Table 3.17-6 summarizes annual tank vessel trips by vessel draft. Over the 5-year period, 65 of the 66 trips were made by tankers.

Table 3.17-6. Distribution of Tank Vessel Trips by Vessel Draft (2008–2012)

Vessel Draft (feet)	Tank Barge Trips						Tanker Trips					
	2008	2009	2010	2011	2012	Total	2008	2009	2010	2011	2012	Total
15–17	0	0	0	1	0	1	0	0	0	2	0	2
18–20	0	0	0	0	0	0	1	1	0	7	0	9
21–23	0	0	0	0	0	0	3	3	1	3	0	10
24–26	0	0	0	0	0	0	5	0	1	6	0	12
27–29	0	0	0	0	0	0	4	1	1	5	4	15
30–32	0	0	0	0	0	0	4	1	0	4	0	9
33–35	0	0	0	0	0	0	3	2	0	0	2	7
36–38	0	0	0	0	0	0	0	1	0	1	0	2
Total	**0**	**0**	**0**	**1**	**0**	**1**	**20**	**9**	**3**	**28**	**6**	**66**

Source: U.S. Army Corps of Engineers 2014b

Table 3.17-7 summarizes annual vessel trips by vessel type and ranges of vessel draft over the 5-year period. Vessel data were summarized for three ranges of vessel drafts: less than 21 feet, 21 to 32 feet, and more than 32 feet. These ranges in vessel draft represent different levels of navigational flexibility. Under current channel conditions, vessels that have drafts under 21 feet have minimal navigational constraint; vessels that have drafts between 21 and 32 feet are likely to find navigable windows , especially at higher tidal elevations; and vessels that have drafts deeper than 32 feet would be highly constrained.

An average of 290 cargo vessels transited each year, compared to an average of 13 tank vessels. Cargo vessels typically had a shallower draft than tank vessels. Approximately 66% of cargo vessels had drafts less than 21 feet, but 69% of tank vessels had drafts between 21 and 32 feet. There were an average of 26 trips per year by cargo vessels with drafts more than 32 feet, and an average of only two tank vessels per year with drafts more than 32 feet.

Overall, 1,515 trips were recorded over the 5-year period: 96% cargo vessels and 4% tank vessels. Of all vessel trips, approximately 64% were by vessels with drafts less than 21 feet, 27% by vessels with drafts between 21 and 32 feet, and 9% by vessels with drafts over 32 feet.

Comparing the actual number of trips (Table 3.17-7) to the estimated number of navigable windows by vessel draft confirms that the assumptions of this analysis are conservative. For example, 41 vessels with drafts more than 32 feet transited the harbor in 2012 compared to an estimated 21 navigable windows per year.

Table 3.17-7. Vessel Trips by Year, Vessel Type, and Vessel Draft (2008–2012)

	Trips by Year						
Vessel Type or Draft	**2008**	**2009**	**2010**	**2011**	**2012**	**Total**	**Avg/yr**
Cargo Vessels by Type[a]							
Barge	292	144	126	173	68	803	161
Ship	105	86	132	115	207	645	129
Total	397	230	258	288	275	1,448	290
Cargo Vessels by Draft							
<21 feet	337	160	146	185	123	951	190
21–32 feet	37	47	86	82	113	365	73
> 32 feet	23	23	26	21	39	132	26
Tank Vessels by Type							
Tank barge	0	0	0	1	0	1	<1
Tanker	20	9	3	28	6	66	13
Total	20	9	3	29	6	67	13
Tank Vessels by Draft							
< 21 feet	1	1	0	10	0	12	2
21–32 feet	16	5	3	18	4	46	9
> 32 feet	3	3	0	1	2	9	2
All Vessels by Type							
Cargo barges and tank barges	292	144	126	174	68	804	161
Cargo ships and tankers	125	95	135	143	213	711	142
Total	**417**	**239**	**261**	**317**	**281**	**1,515**	**303**
All Vessels by Draft							
< 21 feet	338	161	146	195	123	963	193
21–32 feet	53	52	89	100	117	411	82
> 32 feet	26	26	26	22	41	141	28

Source: U.S. Army Corps of Engineers 2014b
[a] This source uses the term *dry-cargo*: includes RoRo vessels.

3.17.4.3 Fishing and Recreational Vessels

Fishing and recreational vessels are much smaller than the large cargo ships and tank vessels already discussed and can move about the harbor without being restricted to the navigation channel because of their shallower drafts. Recreational and tribal fishing are addressed in more detail in Section 3.10, *Recreation*, and Section 3.12, *Tribal Resources*, respectively.

Commercial Fishing Operations

Commercial fishing in the study area includes gillnetting[16] and crabbing. Commercial salmon gillnetters harvest an average of 4,700 coho and 2,000 chum annually (Scharpf pers. comm.). For Grays Harbor and Chehalis River, state regulations set strict rules and fishing schedules on commercial gillnetting. Commercial fishers are restricted to drift gillnet use where the fisher deploys the net from the bow or stern of the fishing vessel perpendicular to the navigation channel.

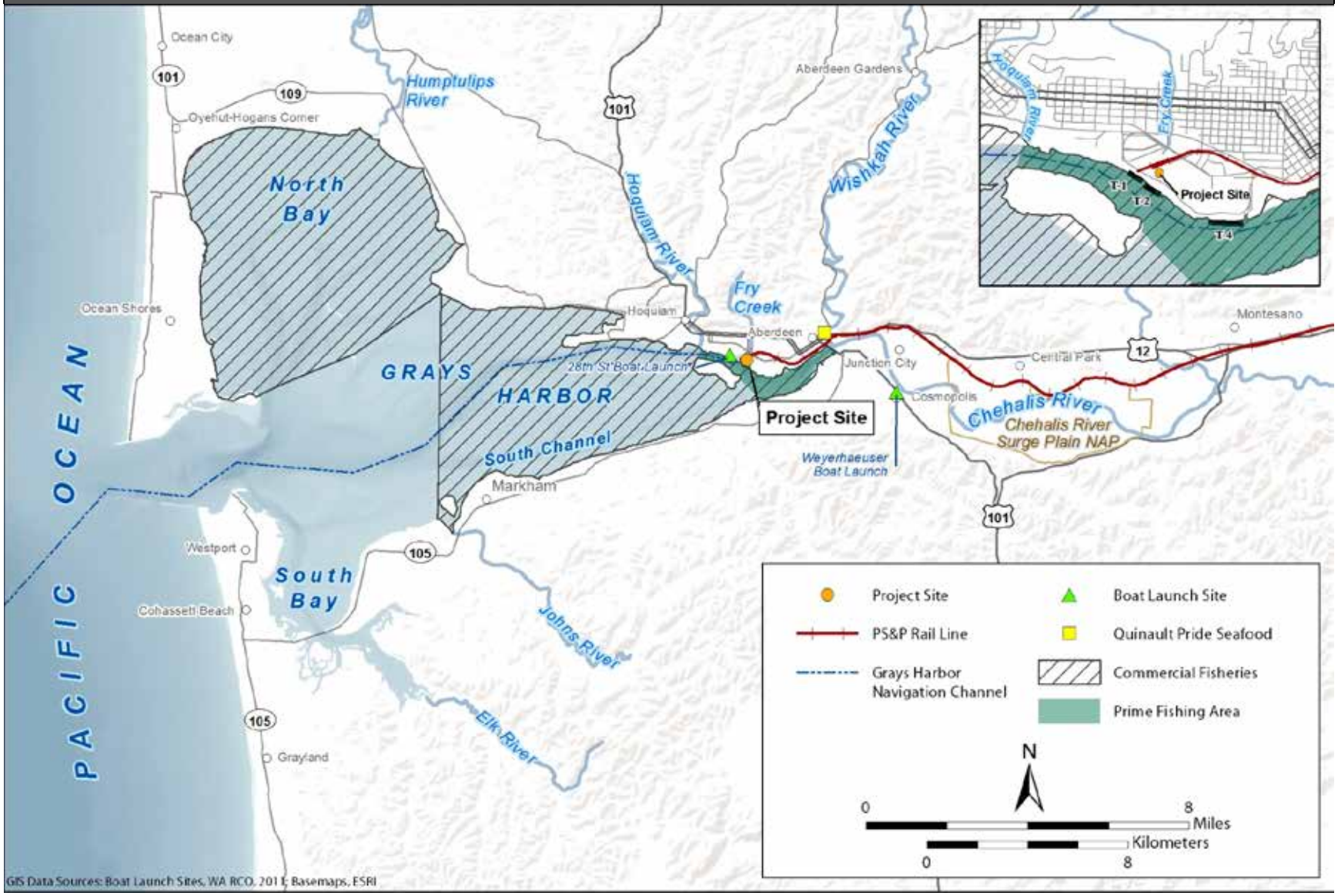
[16] Drift nets only.

Fishers attempt to deploy gillnets to cover as much of the channel as possible to maximize catch. The net is allowed to drift with the currents, sweeping the channel for fish. Fishers need to actively monitor the net and need to be prepared to adjust the net position in the channel to avoid known hazards (e.g., logs, shallow bars, and potentially other vessels).

Commercial regulations for Grays Harbor limit gillnet soak times (from when the net first enters water to when it is completely removed) to less than 45 minutes (Washington Department of Fish and Wildlife 2014). At the end of a drift, the fisher retrieves the net, removing fish at the same time. As reference, information from the Quinault Indian Nation (2015:11) reports time to retrieve a net between 5 minutes at the quickest to 2 hours if the net is loaded with fish.

The commercial gillnet fishing period occurs in the fall (September through November) on permissible days and times in designated areas in the harbor and river (Salmon—Grays Harbor Fall Fishery, WAC 220-36-023). Approximately 15 to 25 boats participate each year up to 5 days per week during the open season (Scharpf pers. comm.) During the open season, permitted areas for commercial gillnetting in the harbor include North Bay and the eastern half of Grays Harbor (Figure 3.17-5). Permitted commercial gillnetting in the Chehalis River occurs from the harbor to the extent shown on Figure 3.17-5, during the same open fishing season as Grays Harbor. However, most commercial fishing occurs in the navigation channel from the Hoquiam River east (Scharpf pers. comm.). The South Bay and central portion of the harbor have been closed to commercial gillnetting since 2005 because of its impacts on Grays Harbor chum and Chehalis River–origin fall Chinook (Washington Department of Fish and Wildlife 2013). Although this area has been closed to commercial fishing for years and is not anticipated to be reopened in the near future, this area could be reopened if salmon stocks increase in numbers (Scharpf pers. comm.).

Figure 3.17-5. Areas of Commercial Fishing in the Study Area



Commercial crabbing occurs along the Washington coast and in Grays Harbor. Over 200 licensed Washington commercial crab fishers participate during the crabbing season (Washington Department of Fish and Wildlife 2015), which is managed by the state. In Grays Harbor, the commercial crabbing season typically runs from December 1 through September 15 (Washington Department of Fish and Wildlife 2015). Unlike gillnetting, all areas of Grays Harbor are permitted for commercial crabbing. Commercial crab harvests in Grays Harbor vary annually and have averaged approximately 71,000 crabs per year over the last 6 years (Washington Department of Fish and Wildlife 2015).

Commercial Fishing Boat Launches and Marinas

The following marinas and public boat launches at the harbor service commercial fishing vessels. The Westport Marina, on the southern peninsula near the entrance to Grays Harbor (Figure 3.17-5), houses more than 200 commercial fishing vessels, including 26 tribal fishing boats, and numerous recreational boats. The marina consists of 21 floats with moorage space for 650 charter, commercial, and sport-fishing vessels (for vessels up to 200 feet). The marina is known as Washington State's largest fish-landing port and, in addition to mooring, provides many boating and fishery services, including loading and fuel docks, a public boat launch, boat manufacturing and repair services, shore-side seafood processing, support service facilities, and fishing supplies.

The Ocean Shores Marina is located on the northern peninsula near the entrance to Grays Harbor but is not currently maintained or open to the public. Additionally, commercial fishing vessels access the harbor via the 28th Street Boat Launch (adjacent to the project site) and the Weyerhaeuser Boat Ramp in Cosmopolis (along the Chehalis River).

Commercial Fishing and Recreational Vessel Traffic

Although there can be as many as 400 or more commercial, tribal and recreational vessels in the harbor during peak fishing times (Scharpf pers. comm.), fishing activities are highly seasonal and occur primarily in the fall with the highest point in September. Commercial and recreational boaters are not limited to the navigation channel and must obey the navigational rules (Inland Navigation Rules 33 CFR 83) to give way to the larger commercial vessels that are limited in their ability to maneuver. All vessels fishing in the navigation channel may have to move gillnets out of the way or risk damage or loss. Under existing conditions, this disruption occurs primarily in the fall during the fall salmon run. In addition, ocean-fishing vessels may use the navigation channel to transport their catch to the harbor. Fishing and recreational vessels move throughout the harbor differently than large commercial vessels. To lessen the danger of hazardous conditions during incoming or outgoing tides, bar crossings are often timed during slack high or low tides, whereas large commercial vessels tend to navigate through the channel when tidal elevations are more than 5 feet.

3.17.4.4 Vessel Traffic Management

The Port, pilots, and USCG are responsible for vessel traffic management in Grays Harbor. Currently, the Port uses an informal vessel management and tracking system for Grays Harbor. The Port monitors and controls vessel movements by routinely communicating with the vessel operators, pilots, and terminals to schedule berths, pilots, and other resources for all arriving and departing vessels. USCG is responsible for establishing navigation rules and for vessel safety in U.S. waters.

Port of Grays Harbor and Washington State Pilots

The Port is involved when vessels call at berths owned and operated by the Port. The Port and Washington State-licensed pilots work closely together when managing vessel movements. The Port's tenants and vessel agents are responsible for providing safe and operationally reliable vessels and commodity information to the Port that directly affects both of the Port's and pilot's traffic management decision-making (WorleyParsons 2014).

For foreign-flagged vessels, a state-licensed pilot is responsible for creating the vessel's itinerary to and from the entrance to Grays Harbor, requesting adequate escort tug services, and navigating the vessels in the channel. For a U.S. vessel operating between U.S. ports, a federally licensed captain is responsible for creating the vessel's itinerary, requesting adequate escort tug services, and navigating the vessels in the channel.

The vessel's agent contacts the Port's on-duty pilot. There are three state-licensed pilots at the Port. Additional pilots for Grays Harbor are currently in training. The vessel's agent provides the pilot with information on vessel characteristics such as size, condition, and the cargo being transported. The pilot then makes an initial assessment of the vessel to schedule the vessel movements and escort tug assistance. The assessment is based on the vessel's physical characteristics and condition, propulsion, commodity type, other known vessel calls, escort tug requirements and availability, forecasted weather, and environmental and tidal conditions, among other factors (WorleyParsons 2014).

Unless a state pilot is requested by the vessel agent, the captain of a U.S.-flagged barge traveling along the coast is authorized to fulfill the above functions. Pilots and ship captains continually reassess environmental conditions and equipment needs before bringing a vessel into Grays Harbor. When approaching Grays Harbor, the vessel calls the pilot over a designated (very high frequency) radio channel. Even as the pilot is transported to board the vessel, the pilot assesses the environment and vessel and decides if conditions are safe to bring the vessel in or if additional tug assistance is needed (WorleyParsons 2014). The pilot is responsible for managing tugs.

Pilots, escort tugs, and captains of commercial vessels and barges inside Grays Harbor communicate using radio channels or sound signals. Commercial vessels and barges are required to maintain watch and carry a properly working radio with back up, in addition to understanding and having the capability to produce sound signals and tones to communicate different meanings (see *Rules of the Road* discussion under *U.S. Coast Guard*).

U.S. Coast Guard

The local USCG station in Grays Harbor (Coast Guard Station Grays Harbor) has authority over the area ranging from Queets River on the Washington coast south to the Long Beach Peninsula, including Willapa Bay. The station has four vessels that perform search-and-rescue missions and has the capability and authority to carry out law enforcement activities within its jurisdiction (U.S. Coast Guard 2015). The station is under the direction of the Captain of the Port for Sector Columbia River, a unit located in Warrenton, Oregon and part of the Thirteenth Coast Guard District.

The Captain of the Port has the authority to close the bar at Grays Harbor if the weather conditions are too severe for vessels to transit. If the entrance to the Port is closed due to weather conditions, the Port, USCG, and state-licensed pilots coordinate ship logistics until the Captain of the Port reopens the entrance (WorleyParsons 2014).

USCG is also responsible for establishing and enforcing Inland Navigation Rules (33 CFR 83), which applies to all vessels in Grays Harbor and off the coast of the U.S. The Rules of the Road are meant to facilitate safe maritime travel. All vessels, including recreational and commercial, are required to understand and comply with the Rules of the Road. USCG works with USACE to determine the navigation channel's physical characteristics, which dictate local rules such as speed, passing clearances, and anchorage locations.

3.17.5 What are the potential impacts on vessel traffic?

This section describes the impacts on vessel traffic that could occur in the study area. Potential impacts of the no-action alternative are described first as a baseline for comparing the potential impacts of the proposed action.

3.17.5.1 No-Action Alternative

Under the no-action alternative, the applicant would continue to operate its existing facility as described in Chapter 2, Section 2.1.2.2, *Existing Operations*. Although the proposed action and related vessel traffic would not occur, it is assumed that growth in the region would continue under the no-action alternative. Large commercial vessel traffic is projected to increase over time in response to anticipated growth. The impacts of this projected increase (unrelated to the proposed action) on berth capacity, channel capacity, and commercial fishing are discussed below. The potential impacts on recreational and tribal fishing are discussed in Section 3.10, *Recreation*, and 3.12, *Tribal Resources*, respectively.

Channel Capacity

Under the no-action alternative, large commercial vessel trips are projected to increase between 2017 and 2037 due to increased trade of commodities, as shown in Table 3.17-8. Cargo vessel trips are projected to increase from 292 to 368 between 2017 and 2037, while tank vessel trips are projected to increase from 46 to 68 over the same period. Total large commercial vessel trips are projected to increase from 338 in 2017 to 436 in 2037 (Table 3.17-8).

Table 3.17-8. Forecast Number of Large Commercial Vessel Trips through Grays Harbor—No-Action Alternative

	Trips[a]	
Type of Vessel	**2017**	**2037**
Cargo vessels		
Ship	220	276
Barge	72	92
Tank vessels		
Tankers and tank barges	46	68
Total	**338**	**436**

[a] A trip represents one-way travel; in other words an inbound and outbound trip are counted as two trips.

Similar to current conditions, a mix mainly cargo vessels and some tank vessels (tankers and tank barges) would be the likely vessel types transporting cargo to the Port terminals and further inland along the Chehalis River.

Cargo barges traveling to destinations at the mouth of the Chehalis River or further inland are forecast to account for approximately 21% of total large commercial vessel trips through Grays Harbor in 2017 (Table 3.17-8). These vessels would likely have drafts between 0 and 17 feet, consistent with vessel data reported between 2008 and 2012 (Table 3.17-5).

Up to half of the cargo ships and tank vessel trips would be made by vessels in ballast, assuming that they are in ballast on either the inbound or the outbound trip. Vessels transiting in ballast would have a shallower draft than vessels laden with cargo. Using vessel data (U.S. Army Corps of Engineers 2014a), ballasted vessels are expected to operate at a draft of less than 27 feet.

Based on these assumptions, it is estimated that a substantial proportion (approximately 61%) of the vessel trips under the no-action alternative would be made by vessels that draft less than 27 feet. As described for existing conditions, these vessels are minimally constrained by tidal elevations at any of the three channel depths considered in this analysis.

The remaining vessel trips (approximately 39%) are projected to be laden cargo ships and tank vessels (with drafts between 27 and 39 feet). Pilots schedule most transits of these vessels when tidal elevations are at 5 feet or above MLLW (U.S. Army Corps of Engineers 2014a:21). As described for existing conditions, 1,274 navigable windows are available each year at these tidal elevations, which far exceeds the total number of annual vessel trips projected over the 20-year planning period for the no-action alternative (338 to 436).

Although navigational windows become more restricted at drafts of 30 feet and more under the 2014 controlling depth (or 39 and 40 feet under the 2014 and 2017 project depths, respectively), vessel operators are able to make choices that influence vessel draft to increase navigational opportunities. For example, a vessel operator may choose to use a shallower-draft vessel to ensure greater navigational flexibility or use a larger vessel (or a more heavily laden vessel) for economic or other reasons and time the trip according to accommodate the more restricted opportunities.

Because the number of navigable windows when tidal elevations are at 5 feet (1,274) or more far exceeds the total number of forecast vessel trips in 2017 (338 trips) or 2037 (436 trips), the channel capacity would not be exceeded under the no-action alternative.

Berth Capacity

Berth capacity at Terminal 1, or its availability for vessel calls, is a function of operational downtime, facility storage and production, ideal tidal conditions for vessel movement, adverse weather conditions, and maintenance. Berth availability is distinct from berth utilization. Berth utilization is the amount of time the berth is actually occupied by a vessel, while berth availability refers to the amount of time that the berth is available for occupancy. Consistent with standard industry best practices for bulk liquid terminals, the average annual operational berth downtime when a berth is unavailable for use is around 10%. In other words, a berth is available up to 90% of the time. This equates to 328 days per year that the Terminal 1 berth would be available to receive vessel calls. As long as the anticipated number of vessel calls to Terminal 1 do not require more than 90% berth availability, the Terminal 1 berth capacity is more than adequate for growth under the no-action alternative (WorleyParsons 2014).

Vessels calling at Terminal 1 to load bulk liquids would be either tank barges or tankers. The operational assumption is that a tank barge would occupy the berth for 24 hours, accounting for

plant start-up, prebooming[17], production, and closedown, before the berth becomes available again. A tanker would occupy the berth for 48 hours (conservatively), accounting for the same berthing conditions but a longer berth occupancy time, which would include waiting for an appropriate tide window for turning and exiting (WorleyParsons 2014). Under the no-action alternative, up to approximately 34 vessels would call at the Terminal 1 berth, which would result in approximately 58 days of berth occupancy[18] of the available 328 days. Therefore, berth capacity would not be exceeded under the no-action alternative of the available 328 days. Therefore, berth capacity would not be exceeded under the no-action alternative.

Pilot and Escort Tug Capacity

Under the no-action alternative, the total number of trips by large commercial vessels is forecast to reach 338 trips in 2017 and 436 trips in 2037. The Port currently employs three state-licensed pilots, which allows two pilots to be on duty at any given time. Foreign-flagged ships and U.S. vessels engaged in foreign trade are required to use a state-licensed pilot by law. While not required, many U.S. vessels engaged in coastwise trade also use a state-licensed pilot on a voluntary basis, or as a matter of company policy because of the state-licensed pilot's expertise and experience guiding vessels in local waters.

Even if all large commercial vessels hired a state-licensed pilot to navigate to and from the Port under the no-action alternative, this would result in a maximum of 436 annual assignments, or approximately 145 annual assignments for each of the three state-licensed pilots employed by the Port. Under this scenario, each state-licensed pilot would pilot vessels to or from the Port a maximum of 145 days out of 365 days, which would not exceed the capacity of state-licensed pilots to pilot large commercial vessels in Grays Harbor.

Brusco Tug & Barge has three harbor tugs stationed in Grays Harbor that are exclusively available for commercial vessel assistance within the harbor. These three tugs are sufficient to escort the projected commercial vessel traffic transiting Grays Harbor. Therefore, the availability of state-licensed pilots and escort tugs is not anticipated to limit the number of vessels transiting the navigation channel under the no-action alternative.

Conflicts with Commercial Fishing

Under the no-action alternative, large commercial vessel trips in the navigation channel are projected to increase from 338 in 2017 to 436 in 2037 (Table 3.17-8). This traffic could slightly increase the potential for impacts on commercial fishing compared to existing conditions. However, as noted in Section 3.17.4.3, *Fishing and Recreational Vessels*, and shown in Figure 3.17-5, no major access points for fishing and recreational vessels would be close enough to be affected by large commercial vessel traffic under the no-action alternative. Additionally, although vessels would occupy the berth more frequently, the potential impacts related to vessel traffic would be limited to the time required for a vessel to move through the navigation channel (approximately 2 hours one way).

[17] Deploying containment booming equipment or alternative measures.
[18] Assumes 7 tankers related to 2017 activities (14 days) and 16 tankers related to 2017 activities (32 days), and 1 tanker (2 days) and 10 tank barges (10 days) related to 2037 activities at the adjacent Westway Terminal Company facility.

3.17.5.2 Proposed Action

This section describes the impacts that could occur in the study area as a result of construction and routine operation of the proposed action. First, this section describes impacts from construction of the proposed action. It then describes impacts of routine operation at the project site and of routine vessel transport to and from the project site.

Construction

Construction of the proposed action would involve no in-water work and no transport of materials by vessel. Therefore, it would have no impact on vessel traffic.

Operations

Under the proposed action, the maximum throughput of bulk liquids at would be 30 million barrels annually. Specifications of the typical vessels that could be used to transport bulk liquids, including tank barges and tankers, are summarized in Table 3.17-9. The table shows how many vessels would be needed for the proposed annual throughput amounts of bulk liquids based on vessel capacity.

Table 3.17-9. Typical Vessels Used for Transport of Bulk Liquids and Number of Calls or Trips Necessary to Transport Proposed Throughput—Proposed Action

			Number of Vessels to Transport Proposed Throughput[a]	
Vessel Type	**Capacity (barrels)**	**Design Draft (feet)**	**Individual Vessels Calls at Terminal 1 Dock**	**Vessel Trips[a]**
Crowley 550-Class tank barge	150,000	27.5	200	400
Crowley 650-Class tank barge	185,000	30	163	326
Crowley 750-Class tank barge	330,000	35	91	182
Panamax tanker[b]	350,000	39.5	86	172

[a] At maximum throughput; number assumes transport of total throughput is undertaken by a single vessel type.
[b] Capacity can range from 300,000 to 600,000; however, larger Panamax class tankers are typically loaded in the 350,000-barrel range.

Any combination of tank barges and tankers, including those listed in Table 3.17-9, could be used to transport bulk liquids from Terminal 1. While the type of ship is expected to be determined by the Applicant's customer, the ships will be identified in advance as described earlier and would be required to meet all vessel regulations for U.S. and Washington waters. The type of ship used will also be based on the controlling depth of the navigation channel. While vessels with a larger capacity tend to be more economical, their deeper drafts may limit their opportunities to transit the navigation channel, causing waiting periods and inefficiencies. Because of the channel depth limitations, the Panamax tanker (965 feet long, 106 feet wide, with a 39.5-foot draft) would be the largest vessel expected to enter Grays Harbor.

Barges have a smaller capacity and more flexibility to transit the navigation channel due to their shallower draft, but more vessel trips are required to transport the same volume of bulk liquids that the larger tankers could transport (Table 3.17-9).

This analysis assumes that tank barges such as the Crowley 550-Class tank barge, or similar vessel, would be used to transport bulk liquids from Terminal 1. The Crowley 550-Class tank barge has a

length of 605 feet, width of 78 feet and draft of 27 feet 6 inches. This barge is designed for an escort tug to fit into a specially articulated notch in the stern of the barge to allow the tug and barge to move together.

Using this type of tank barge for the analysis results in the most vessel trips and is the most likely scenario under current channel conditions (controlling depth of 27 feet MLLW). Under this scenario, operation of the proposed action at maximum throughput would result in a total of 200 annual vessel calls at Terminal 1 or a total of 400[19] vessel trips through the navigation channel. This annual vessel traffic would correspond to an average of 1.09 trips on a daily basis or an average of 7.7 trips on a weekly basis (Table 3.17-10). If vessels with a higher capacity call at Terminal 1, the number of vessel trips would be reduced.

Table 3.17-10. Vessel Trips—Proposed Action

Average Daily	Average Weekly	Maximum Annual
1.09	7.7	400

[a] Assumes highest level of vessel traffic using Crowley 550-Class tank barges.

Table 3.17-11 presents increases in tank vessel trips under the proposed action in the context of forecast increases in baseline trips of large commercial vessels over the 20-year analysis period (2017 to 2037). Between 2017 and 2037, under the no-action alternative, cargo vessel trips are forecast to increase from 292 to 368 per year due to annual growth in trade of commodities, and tank vessel trips are forecast to increase from 46 to 68 per year. Adding the proposed action tank vessel trips to forecasted growth in vessel traffic would increase to 724 in 2017 and 822 in 2037. This equals approximately 2.0 vessel trips a day in 2017 and 2.3 vessel trips a day in 2037.

Table 3.17-11. Forecast Number of Large Commercial Vessel Trips—Proposed Action (2017–2037)

Type of Vessel	2017	2037
Baseline		
Cargo ships	220	276
Cargo barges	72	92
Tank vessels[a]	32	54
Proposed Action		
Tank vessels	400	400
Total trips	**724**	**822**

[a] Number includes existing and projected vessels related to the Westway project only; Imperium no-action vessels not counted, because the proposed action includes total for facility.

Channel Capacity

Approximately 56% of the trips would be cargo barges traveling to locations along the Chehalis River or unladen vessels in ballast. As described under the no-action alternative, these vessels would likely draft less than 27 feet and would be minimally constrained by tidal elevations at any of the three channel depths considered in this analysis.

[19] Proposed vessel trips are total for the facility so are not in addition to trips attributable to the applicant under the no-action alternative (approximately 14 per year).

The remaining vessels trips (approximately 44%) are projected to be laden cargo ships and tank vessels (with drafts between 27 and 39 feet). As described for the no-action alternative, pilots typically schedule transits of these vessels when tidal elevations are at 5 feet or above MLLW (U.S. Army Corps of Engineers 2014a:21). At these tidal elevations, 1,274 navigable windows are available each year, which exceeds the total number of trips in 2017 and 2037 (724 to 822).

Although navigational windows become more restricted at drafts of 30 feet and more under the 2014 controlling depth (or 39 and 40 feet under the 2014 and 2017 project depths, respectively), vessel operators are able to make choices that influence vessel draft to increase navigational opportunities. For example, a vessel operator may choose to use a shallower-draft vessel to ensure greater navigational flexibility or use a larger vessel (or a more heavily laden vessel) for economic or other reasons and time the trip according to accommodate the more restricted opportunities.

Because the number of navigable windows exceeds the total number of vessel trips, the channel capacity would not be exceeded under the proposed action.

Berth Capacity

Berth capacity at Terminal 1, as discussed for the no-action alternative, is adequate as long as the total days of occupation do not exceed 328 days per year. When tank vessels call at the Terminal 1 berth, they are estimated to occupy the berth for 24 hours (tank barges) to 48 hours (tankers). If only tank barges call at Terminal 1, the 200 vessels per year for the proposed action at maximum throughput would result in 200 days of berth occupancy, out of 328 days that the berth would be available. If tankers call at Terminal 1 instead of tank barges, the berth occupancy time would increase, but the number of vessel calls would decrease. For example, if only Panamax tankers call at Terminal 1, approximately 86 vessel calls per year would be required (Table 3.17-8), and the berth would be occupied for a total of 172 out of 328 days.

Adding days of Terminal 1 berth occupancy related to the proposed action (a maximum of 200 days) to 44 days[20] for existing and projected vessels engaged by the adjacent methanol facility, the berth would be occupied for a maximum of 244 days. This occupancy level is well below the 328 days of estimated berth availability. Therefore, the proposed action would not have a substantial impact on berth capacity.

Pilot and Escort Tug Capacity

State-Licensed Pilots

As discussed for the no-action alternative, only foreign-flagged vessels and U.S. vessels engaged in foreign trade are required to use a state-licensed pilot by regulation. However, many U.S. vessels calling at Washington State ports seek the assistance of a state-licensed pilot on a voluntary basis, or as a matter of company policy, even though it is not required by regulation. The Port currently employs three state-licensed pilots and two pilots are on duty at any given time.

Under the proposed action, the total number of trips (proposed action and baseline) by large commercial vessels is forecast to reach 724 trips in 2017 and 822 trips in 2037. If all large

[20] Assumes 16 tankers related to existing activities (32 days), and 1 tanker (2 days) and 10 tank barges (10 days) related to projected activities at the adjacent Westway Terminal Company facility; Imperium no-action vessels not counted, because the proposed action includes total for facility.

commercial vessels hire a state-licensed pilot to navigate to and from the Port, this would result in a maximum of 822 annual assignments in 2037, or approximately 274 annual assignments for each of three state-licensed pilots employed by the Port. Under this scenario, each state-licensed pilot would pilot vessels to or from the Port a maximum of 274 days out of 365 days, which would not exceed the capacity of state-licensed pilots currently employed by the Port.

Additionally, pilots may pilot more than one vessel per day. Pilot trips in Grays Harbor are approximately 2 hours Because Grays Harbor has a semidiurnal tidal cycle (two high tides per day), there is more than one navigable window each day to pilot a vessel to or from the Port.

The Puget Sound Pilot Commission is responsible for Washington State licensed pilots and evaluates the need for pilots regularly. If additional pilots were needed, they could be hired and trained. It takes approximately 9 months for a new pilot to obtain a state license to handle smaller vessels and approximately 2.5 years to get fully qualified. If necessary, due to an unanticipated pilot shortage, the Puget Sound Pilot Commission could provide support to the Port by temporarily reassigning a qualified state-licensed pilot from Puget Sound to Grays Harbor (Larson pers. comm.).

Based on interviews with the Port, the Pilotage Commission, and a Grays Harbor state-licensed pilot and on forecasted vessel numbers under the proposed action, the current number of state-licensed pilots available for Grays Harbor[21] is adequate for the pilotage services required by the Port under current and foreseeable vessel traffic conditions.

Escort Tugs

Brusco Tug & Barge has three harbor tugs stationed in Grays Harbor that are exclusively available for commercial vessel assistance in the harbor. During normal operations, two escort tugs (one at the bow and one at the stern) assist large commercial vessels (cargo ships and tank vessels) with docking and undocking at the terminal berths. A third escort tug may be used when conditions warrant, such as when there are high winds (D'Angelo pers. comm.).

Including vessels under the proposed action at maximum throughput, inbound or outbound trips by large commercial vessels through the navigation channel are forecast to reach 724 in 2017 and 822 in 2037, which is equal to approximately 2.0 vessel trips a day in 2017 and 2.3 vessel trips a day in 2037. Both inbound and outbound vessels would use escort tugs during docking (inbound vessels) or undocking (outbound vessels). Escort tugs can be moved between the Port terminals to assist with docking and undocking, and their availability would not limit vessel operations at the Port under the proposed action.

Escort tugs are not currently required for tank vessels in Grays Harbor. Oil tankers carrying product to or from the Imperium project site do use escort tugs as part of their Washington State-approved facility operations plan. However, the Harbor Safety Plan for Grays Harbor has a standard of care (similar to a best management practice) that recommends escort tugs for all laden tank vessels carrying oil. The standards recommend the following practices.

- At least one escort tug will meet an arriving laden tank vessel or barge carrying oil at the Grays Harbor entrance and escort it to the Hoquiam River where two tugs will assist the vessel during mooring procedures.

[21] Allowing for reassignment of pilots from Puget Sound.

- At least one escort tug will accompany a departing laden tank vessel carrying oil from the terminal to the entrance of Grays Harbor.

At maximum throughput, the proposed action would result in 200 annual tank vessel calls at Terminal 1 to transport bulk liquids. Adding the proposed action tank vessel calls to baseline forecasts would increase the total number of forecast tank vessel calls to 216 in 2017 and 227 in 2037. A single vessel call includes an inbound and an outbound vessel transit, and it is assumed that the vessel is laden (and therefore requires an escort) in only one direction. Under this scenario, less than one tank vessel call per day, on average, would require an escort tug, which would not exceed the capacity of tugs to escort laden tank vessels.

Escort tugs reduce the potential for a vessel incident such as loss of steering or loss of propulsion that could affect vessel traffic and pose a safety risk. Mitigation measures related to escort tugs are described in Section 3.17.7.2, *Applicant Mitigation*.

In addition, mitigation related to reducing the risk of a vessel incident as related to spills is described in Chapter 4.

Conflicts with Commercial Fishing

Increased vessel traffic related to the proposed action could affect commercial fishing activities by restricting access to certain areas in the harbor. Because vessel traffic under the proposed action would be limited to the navigation channel and Terminal 1 berth, impacts on commercial fishing in the harbor but outside the channel are not expected.

As described above, adding proposed action vessels to baseline vessels would result in occupancy of the Terminal 1 berth up to approximately 244 days per year compared to 58 days per year under the no-action alternative. On average, vessels related to the proposed action would be at the dock approximately 4 days per week compared to an average of 1 day per week without the proposed action. Additionally, operation of the proposed action at maximum throughput would result in an average of approximately one tank vessel trip per day (a maximum of 400 per year[22]) along the navigation channel to the 436 large commercial vessel trips per year under the no-action alternative.

As noted in Section 3.17.4.3, *Fishing and Recreational Vessels,* one of the prime commercial fishing areas is located in the navigation channel east of the Hoquiam River. Access to this area would be restricted during vessel loading and tank vessel transits. During periods of maximum catch for Chinook, coho, or chum salmon, the fall fishery may be open 2 to 4 days per week. Approximately 15 to 25 boats participate each year up to 5 days per week during the open season (Scharpf pers. comm.).

Assuming a 24-hour maximum berth occupancy and vessels evenly dispersed over the week, it is likely a vessel would be at the dock or traveling through the navigation channel during a portion of the open fishing season. Depending on the specific circumstances of each interaction (e.g., chance of a vessel calling during an open fishing window, distribution of the fish within the channel, number of fishers on any given day), it is difficult to predict whether increased occupancy at Terminal 1 would significantly affect any single fisher's daily catch. However, if a vessel is at berth during the fall

[22] Proposed vessel trips are total for the facility so are not in addition to trips attributable to the applicant under the no-action alternative (approximately 14 per year).

fishery, fishers would have the option to fish longer (complete more drifts) or may choose to fish other preferred locations in Grays Harbor (such as other portions of the navigation channel, farther away from the shoreline or father upstream). However, opportunities to relocate during intense fishing periods may be limited if the other areas are occupied by fishers. Implementation of the mitigation described in Section 3.12.7.2, *Applicant Mitigation,* would reduce the potential impacts on commercial fishing.

Vessel traffic at other times of the year likely would have less of an impact because fewer fishers are participating in the fishery and fishers would therefore likely have more options to adjust their fishing efforts to other preferred areas in Grays Harbor and the Chehalis River. As noted in Section 3.12.7.2, *Applicant Mitigation*, providing advance notice of incoming vessels related to the proposed action could reduce potential conflicts. Although it is difficult to predict whether the increased vessel traffic would result in an overall inability of a fisher to reach their limit, increased traffic would limit access to commercial fishing areas. Implementation of the mitigation described in Section 3.12.7.2, *Applicant Mitigation*, would help address this impact.

As noted in Section 3.17.4.3, *Fishing and Recreational Vessels,* ocean-fishing vessels may use the navigation channel to transport their catch to the harbor. To lessen the danger of hazardous conditions during incoming or outgoing tides, bar crossings are often timed during slack high or low tides, whereas large commercial vessels tend to navigate through the channel when tidal elevations are more than 5 feet. Additionally, as noted previously, commercial fishers can navigate around larger vessels limited to the navigation channel to avoid potential impacts.

An analysis of impacts from increased risk of accidents (e.g., vessel collisions) and related consequences (e.g., oil spills) is provided in Chapter 4, *Environmental Health and Safety.*

3.17.6 What required permits apply to vessel traffic?

No required permits or plans apply to vessel traffic.

3.17.7 What mitigation measures would reduce impacts on vessel traffic?

This section describes the applicant mitigation that would reduce impacts on vessel traffic from construction and routine operation of the proposed action.

3.17.7.1 Applicant Mitigation

The applicant will implement the following mitigation.

- Due to sensitivity of the local environment, tribal resources, and the potential presence of special-status species, to reduce potential risk of incident due to loss of propulsion, loss of steering, grounding, or severe weather, the applicant will not receive or load crude oil to tankers or tank barges unless the vessels have escort tugs through Grays Harbor as described below. This requirement will remain in place until rules are implemented pursuant to Engrossed Substitute House Bill 1449, Section 12, at which time the rules will apply to the project. At least one escort tug must accompany a laden tanker or tank barge carrying oil between the Hoquiam River and Grays Harbor entrance, and two tugs (one escort tug and one assist tug) must assist the vessel during mooring procedures.

  - For laden tankers, the escort tug must be appropriately tethered while transiting Grays Harbor.
  - Escort tugs must have an aggregate shaft horsepower equivalent to at least 5% of the deadweight tons of the escorted oil tanker or tank barge.
  - Escort tugs must have sufficient mechanical capabilities to provide for safe escort.
- To ensure adequate safety for escort tug operations and thereby reduce the risk of an incident, the applicant will not receive or load crude oil to tankers or tank barges unless the vessels supply Grays Harbor pilots and tug companies with bollard pull capacities of the vessels prior to entering Grays Harbor.
- To reduce potential risk of incident of vessel collision or allision in Grays Harbor, the applicant will work with U.S. Coast Guard, Ecology, Port of Grays Harbor, and Grays Harbor Safety Committee to propose, develop, and implement a formal vessel management system. The vessel management system will include the ability to schedule, track, and monitor vessel movements in the harbor and off the entrance to the harbor. The vessel management system will be active prior to the applicant beginning the proposed operations.
- To reduce potential risk of incident of vessel collision while in Grays Harbor, the vessel management system will take the following actions.
  - Ensure vessel traffic is limited while a laden tank vessel is in the navigation channel.
  - Prohibit the transit of any other deep-draft vessels within the south channel (just off Westport) to Terminal 1 in both directions whenever a laden tank vessel is transiting within the same channel.
  - Include real-time automatic identification system tracking and monitoring.
- To reduce the risk of an incident, the applicant will coordinate with the Port of Grays Harbor and as a member of the Grays Harbor Safety Committee, work to develop and implement specific procedures for escorting, tethering, and emergency maneuvering to control laden tank vessels. The procedures must be drafted prior to the proposed operations beginning. These procedures should be included in the Grays Harbor Safety Plan. At a minimum, these must include the following elements.
  - Escort configurations and maneuvering characteristics of escorted tankers and tank barges.
  - Specific emergency connection and tethering procedures for connection of escort tugs to tankers and tank barges.
  - Specific maneuvers necessary for the escort tug to maintain control of the tanker while transiting Grays Harbor waters specifically during incidents of loss of propulsion or steering or in bad weather.
  - Appropriate safe speed of transit in Grays Harbor when escort tugs are tethered.
  - Guidelines for tanker or tank barge bridge team to rapidly recognize and respond to a loss of power or steering. By improving recognition and reaction time, the escort tugs can more effectively steer the vessel through the navigation channel upon incident.
  - Requirement for a pretransit conference.
  - Requirements for refueling of the vessel.

- While commercial fishing boats are required to follow the U.S. Coast Guard navigation rules, to improve awareness of vessel traffic in the navigation channel, the applicant will work with the Grays Harbor Safety Committee, including the U.S. Coast Guard and Port of Grays Harbor, to establish procedures to announce project related vessel traffic arrivals and departures over a designated very high frequency (VHF) marine radio channel.

3.17.8 Would the proposed action have unavoidable significant adverse impacts on vessel traffic?

Under existing fishing conditions, increased vessel traffic would cause a disruption when commercial fishers are in the navigation channel. This conflict is most likely to occur related to harvest of salmon, steelhead, and sturgeon during the fall fishery. Although vessel operations related to the proposed action are reasonably certain, it is not possible to determine how the proposed action could affect a commercial fisher's daily catch because of other unpredictable factors (number of fishers, fish distribution, timing, and duration of fishing window on any given day of any given week). However, it is anticipated that because there are alternate fishing areas and because there would be additional days/windows to fish uninterrupted, impacts would not be significant.

Chapter 4
Environmental Health and Safety

4.1 Introduction

The proposed action would involve the handling and storage of the proposed bulk liquids on the project site. Additionally, the proposed bulk liquids would be transported by rail to the project site and by vessel from the project site to end destinations. Spills of oil or other hazardous substances related to the proposed action could occur on land or in water, at any time of day or night, and in any weather condition. It is impossible to know exactly when a spill is going to happen and how much oil is likely to be spilled. However, it is possible to identify risks based on the materials involved, where they are stored, how they are stored, the corridors through which they would travel, and typical weather conditions. While preventing a spill is the best strategy for avoiding potential damage to human health and the environment, once a spill occurs, a rapid, aggressive, and organized response can contain and control the spill and minimize damage.

4.1.1 What is the scope of this analysis?

This chapter presents the analysis of environmental health and safety impacts associated with incidents involving spills of the proposed bulk liquids[1], fires, or explosions during onsite handling and storage and offsite rail and vessel transport. The subsections that follow describe the scope of the analysis, study area, general approach used in this analysis, applicable regulations, and general risk considerations as developed with guidance from the co-lead agencies. The remaining sections of this chapter address potential impacts for terminal (onsite) operations, from rail transport, and from vessel transport. These sections also identify the existing requirements for each area and additional mitigation measures to offset potential impacts. The thresholds and measures were developed based on direction and guidance from the co-lead agencies. The chapter concludes with an analysis of the general environmental impacts of oil spills, fires, or explosions on the resources identified in Chapter 3, *Affected Environment, Impacts, and Mitigation.*

Impacts related to extended transport are described in Chapter 5, *Extended Rail and Vessel Transport*. Cumulative impacts on environmental health and safety are addressed in Chapter 6, *Cumulative Impacts*. Socioeconomic impacts are addressed in Chapter 7, *Economics, Social Policy, and Cost-Benefit Analysis.*

[1] The analysis presented in this chapter focuses on Bakken crude oil but generally applies to all of the bulk liquids proposed for storage and handling by the applicant (Bakken crude oil, diluted bitumen, ethanol, naphtha, gasoline, vacuum gas oil, jet fuel, no. 2 fuel oil, no. 6 fuel oil, kerosene, renewable jet fuel, renewable diesel, used cooking oil, and animal fat). In places where there is a material change in risk or consequence due the chemical properties of a specific material (e.g., Bakken crude oil versus bitumen or jet fuel), the difference is discussed specific to the material in question. Potential hazardous materials impacts associated with onsite operations are addressed in Section 3.14, *Hazardous Materials*.

4.1.2 What is the study area?

The study area for environmental health and safety includes humans and resources that could be harmed in the event of a spill during operation at the project site, during rail transport along the Puget Sound & Pacific Railroad (PS&P) rail line—from Centralia, Washington, to the project site—and during vessel transport in Grays Harbor.[2] These resources are described generally in this chapter and in detail in Chapter 3, *Affected Environment, Impacts, and Mitigation Measures*.

Because transport of oil would extend beyond this detailed study area, the risks of rail transport outside the PS&P rail line (on the BNSF Railway Company [BNSF] and Union Pacific main lines) and beyond state waters (during transit along the west coast and abroad) are discussed qualitatively in in Chapter 5, *Extended Rail and Vessel Transport*.

4.1.3 What is the approach to this analysis?

4.1.3.1 Information Sources

Numerous sources provided information on materials, risks, and transportation, as cited in the appropriate sections. A guiding source of information was the *Washington State 2014 Marine and Rail Oil Transportation Study* published by the Washington State Department of Ecology (Ecology) in March 2015 (Washington State Department of Ecology 2015).

The Washington State Legislature directed Ecology, in consultation with the Washington Utilities and Transportation Commission, Washington Military Department's Emergency Management Division, Federal Railroad Administration, and Washington State Department of Transportation to conduct a study on marine and rail oil transportation. In June 2014, Governor Inslee issued an Oil Transport Directive to Ecology outlining key components to be addressed. The Legislature's and Governor's actions were driven by the rapid changes in how crude oil is moving through rail corridors and over Washington waters, creating new safety and environmental risks. The study focused on developing recommendations to foster public health and safety, environmental protection, and respect for tribal treaty rights. Recommendations and information from the study are included as appropriate throughout this draft environmental impact statement.

New oil transportation safety legislation was passed in 2015 at the request of Governor Inslee. The legislation became effective July 1, 2015 in Engrossed Substitute House Bill (ESHB) 1449. The bill addresses financial assurance requirements for facilities and vessels, oil spill prevention plans and oil spill contingency plans, oil tanker tug escorts, and emergency response planning.

4.1.3.2 Risk Analysis

Risk management involves the systematic identification, evaluation, and control of impacts that may arise from uncertain future events such as spills, fires, explosions, toxic releases, or natural disasters. Assessing a risk to a particular resource requires identifying possible hazards, evaluating the frequency of adverse events and the magnitude of their consequences, and determining

[2] The proposed action would result in increased rail and vessel traffic related to the transport of the proposed bulk liquids to and from the project site. Therefore, resources that could be affected during rail and vessel transportation are considered in this analysis.

appropriate measures for prevention or mitigation. By anticipating the level of risk and the potential impacts, preventive and mitigation measures can be implemented to reduce the frequency of an event, the impacts, or both.

Because it is not possible to predict the timing or magnitude of a spill, this chapter focuses on spill scenarios. Scenarios were developed for a range of potential incidents involving the terminal, trains, and vessels. These scenarios considered spills, fires, or explosions related to existing conditions (no-action alternative), routine operation of the proposed action at the project site and during rail and vessel transport, and worst-case spills. Risk assessments used the following scenarios to identify the likelihood a spill could happen.

- Incidents involving onsite handling and storage of crude oil and bulk materials at the project site.
- Incidents involving trains transporting crude oil and bulk materials along the PS&P rail line.
- Incidents involving vessels transporting crude oil and bulk materials in Grays Harbor.

The scenarios considered various sizes of potential spills based on the activity (such as transport or transferring oil) and size of tank, rail cars, and vessels. Spill scenarios are referred to using the amount of material spilled. The potential impacts would be related to the amount spilled, location, and other conditions. Table 4.1-1 presents these spill scenarios by source (project site, rail transport, vessel transport) and spill size.

Table 4.1-1. Oil Spill Scenarios by Size

Source	Spill Scenario
Small	
Project site	2,100 gallons (50 barrels) spilled when transferring oil from rail cars or to vessels at the project site
Rail transport	1,000 gallons (24 barrels) spilled during a derailment along the PS&P rail line
Medium	
Project site	10,000 gallons (238 barrels) spilled when transferring oil to a vessel at the project site
	50,400 gallons (1,200 barrels) spilled from pipeline or storage tank at the project site
Rail transport	30,000 gallons (714 barrels or the contents of one full tank car) spilled during a derailment along the PS&P rail line
Large	
Project site	3.36 million gallons (80,000 barrels or the entire contents of one full storage tank) spilled on site
Rail transport	90,000 gallons (2,140 barrels or the contents of three full tank cars) spilled during a derailment along the PS&P rail line
	150,000 gallons (3,570 barrels or the contents of five full tank cars) spilled during a derailment along the PS&P rail line
	900,000 gallons (21,400 barrels or the contents of 30 full tank cars) spilled during a derailment along the PS&P rail line
Vessel transport	105,000 gallons (2,500 barrels) spilled into Grays Harbor from a vessel collision
	Up to 1.2 million gallons (29,000 barrels) from a vessel grounding in Grays Harbor
	15.1 million gallons (360,000 barrels or the entire contents of one full tanker, including fuel) spilled into Grays Harbor from a vessel allision at harbor entrance

The risk assessment first determined the likelihood that a spill would occur. In general, the larger the spill, the less likely that the spill would be expected to occur. The following methods were used to determine likelihood of occurrence.

- For spills at the project site, operations information, such as the number of rail car unloadings, vessel loadings, and storage tanks in use, was combined with historical information on spills associated with these activities to determine the likelihood of spills.
- For spills along the PS&P rail line, the number of rail trips carrying crude oil was combined with historical information from the Federal Rail Administration on incidents along the PS&P rail line and across the country to determine the likelihood of spills.
- For spills during vessel transport, the number of vessel trips carrying crude oil was combined with historical information on vessel incidents to determine the likelihood of spills.

The risk assessment considered the type of operations, transportation routes for trains and vessels, and historical incident data to determine the likelihood of an incident happening. The analysis looked at a 20-year period from 2017 to 2037 for the proposed action.

The analysis first quantified the *chance* of each spill scenario occurring in any given year in the 20-year analysis period. It then qualitatively assessed the *likelihood* based on the likelihood of an incident occurring. The quantitative analysis is included in Appendix M, *Risk Assessment Technical Report*.

The *likelihood of an incident* is defined as follows.

- **Likely to happen.** Involves regular transportation and facility operations or conditions that would be expected *to frequently happen*.
- **Unlikely to happen.** Involves unusual operations or conditions that would be expected *to rarely happen*.

4.1.3.3 Risk of a Spill Reaching Water

A spill of oil or hazardous material that reaches water has a greater potential to affect the environment or people. A spill on land would affect resources but, in general, would be easier to contain and cleanup. Water can move oil or other materials over a bigger area and increase the complexity of a spill. Weather conditions, tides, river flows, and wind patterns greatly affect the movement of oil or hazardous materials in water. To provide a general idea of the movement and extent of the area that could be affected by an oil spill to water, oil spill models were done for Grays Harbor and the Chehalis River (Appendix N, *Oil Spill Modeling*).

Federal and state regulations require equipment and design features, such as containment areas to catch spills or equipment like emergency shutoffs. These requirements are factors in determining the amount of oil that could reach water and are described in Section 4.1, *Environmental Health Risks—Terminal (Onsite)*; Section 4.5, *Environmental Health—Rail Transport*; and Section 4.6, *Environmental Health—Vessel Transport.* The likelihood of a spill reaching water is defined as follows.

- **Likely to reach water.** Incident occurs on or near the water and outside of a containment area.

- **Unlikely to reach water.** All or most of the spill is within a containment area or incident is not near water.

4.1.3.4 Potential to Affect Environment

Impacts from an incident such as an oil spill, fire, or explosion vary widely based on the material type and amount, location, proximity to water, and weather conditions. The size of a spill does not alone determine the potential impacts. A small spill in a sensitive area could have significant impacts, as could a large spill or explosion. Therefore, impacts are not specifically identified for each spill scenario but are discussed generally in Section 4.7, *Impacts on Resources*.

For the purposes of this environmental review, the qualitative terms used to describe the potential to affect the environment are defined as follows.

- **Severe environmental impacts.** The spill is likely to result in a large amount of oil entering the environment and extensive damage to the human and natural environment. This would include large uncontained spills requiring extensive emergency response and cleanup efforts and a greater potential for the spill circumstances to result in fires or explosions.
- **Low environmental impacts.** The spill could result in a small amount or no oil entering the environment. This would include small spills that would likely be contained and cleaned up relatively easily and would have a low potential for ignition.

4.2 Applicable Regulations

Laws and regulations relevant to determining potential impacts on environmental health and safety are summarized in Table 4.2-1. More information about the applicable laws and regulations is provided in Appendix B, *Laws and Regulations*.

Table 4.2-1. Laws and Regulations for Environmental Health and Safety

Laws and Regulations	Description
Federal	
Anchorages under Ports and Waterways Safety Act (33 CFR 109)	Authorizes USCG to specify times of movement, restrict operations, and direct anchoring of vessels under hazardous conditions.
Financial Responsibility for Water Pollution (Vessels) and Oil Pollution Act, Limits of Liability (Vessels and Deepwater Ports) (33 CFR 138)	Establishes requirements for responsible parties to demonstrate financial ability to meet potential liability for costs and damages.
Facilities Transferring Oil or Hazardous Materials in Bulk (33 CFR 154)	Requires facilities transferring oil or other hazardous materials in bulk to submit an operations manual to USCG for approval.
Vessel Contingency and Response Plans (33 CFR 155)	Requires development, implementation, and annual review of a vessel response plan approved by USCG.
Oil and Hazardous Material Transfer Operations (33 CFR 156)	Specifies procedures and requirements for transferring oil and other hazardous materials to/from vessels.
Oil Pollution Prevention (40 CFR 112)	Requires facilities to prepare and implement a spill prevention control and countermeasure plan in accordance with good engineering practices.
Pipeline and Hazardous Materials Safety Administration (49 CFR 105–110, 130, and 171–180)	Regulates the movement of hazardous materials. 49 CFR 130 requires that a basic oil spill response plan is developed for rail cars carrying liquid petroleum or nonpetroleum oil with a capacity of 3,500 gallons or more.
Oil Pollution Act of 1990 (33 U.S.C. 40)	Expands the federal government's ability to prevent and respond to oil spills and preserves state authority to establish laws governing oil spill prevention and response.
Clean Water Act (33 U.S.C. 1251 et seq.)	Establishes the basic structure for regulating discharges of pollutants into navigable waters of the United States by regulating point pollution sources, such as stormwater discharges, and contains specific provisions related to the incidental release of oil and other hazardous substances into U.S. waters.
Limits on Liability (33 U.S.C. 2704)	Establishes limits on liability of a responsible party to incur costs from an incident.
Hazardous Materials Transportation Act (49 U.S.C. 51)	Regulates all aspects of hazardous materials packaging, handling, and transportation for vessel, truck, and rail.
Enhanced Tank Car Standards and Operational Controls for High-Hazard Flammable Trains (80 FR 26643)	The final rule, passed May 8, 2015, defines and regulates the operations of high-hazard flammable trains.

Laws and Regulations	Description
State	
Transportation Regulations (RCW 81)	Regulates transportation in Washington State and administers railroad safety provisions allowed under 49 U.S.C. 20106 and state law (RCW 81.04.540), rules for the equipment used by common carriers (RCW 81.44), and railroad crossings (RCW 81.53).
Pilotage Act (RCW 88.16)	Establishes requirements for compulsory pilotage provisions in certain waters of the state, including Grays Harbor.
Transport of Petroleum Products – Financial Responsibility (RCW 88.40)	Defines and prescribes financial responsibility requirements for vessels that transport petroleum products across state waters and facilities that store, handle, or transfer oil or hazardous substances near navigable waters of the state.
Vessel Oil Spill Prevention and Response (RCW 88.46)	Establishes rules and regulations for tank vessels that carry oil and enter navigable waters of the state.
Oil and Hazardous Substance Spill Prevention and Response (Oil Spill Act) (RCW 90.56)	Establishes programs to reduce the risk and develop an approach to respond to oil and hazardous substance spills; provides a simplified process to calculate damages from an oil spill; holds responsible parties liable for damages resulting from injuries to public resources.
Hazardous Chemical Emergency Response Planning and Community Right-to-Know Act of 1986 (WAC 118-40)	Establishes requirements for federal, state, and local governments, and industry to improve hazardous chemical preparedness and response through coordination and planning; provisions include public notification about chemicals used at facilities.
Facility Oil Handling Standards (WAC 173-180)	Establishes minimum standards for safe oil transfer operations to meet a zero spill goal established by the legislature.
Oil Spill Contingency Plan Requirements (WAC 173-182)	Requires larger oil handling facilities and commercial vessels to have state-approved oil spill contingency plans that describe their ability to respond to oil spills. Identifies specific standards for Grays Harbor.
Oil Spill Natural Resources Damage Assessment (WAC 173-183)	Establishes procedures for convening a resource damage assessment committee, pre-assessment screening of damages, and selecting the damage assessment method.
Vessel Oil Transfer Advance Notice and Containment Requirements (WAC 173-184)	Requires facility operators who transfer oil to provide Ecology with a 24-hour advance notice of transfer.
Local	
No local regulations apply to environmental health and safety.	

CFR = Code of Federal Regulations; USCG = U.S. Coast Guard; U.S.C. = United States Code; FR = Federal Register; RCW = Revised Code of Washington; WAC = Washington Administrative Code; Ecology = Washington State Department of Ecology

Regulations developed pursuant to these laws establish the basis for prevention, preparedness, and response to potential spills. The Washington State Department of Ecology (Ecology) has responsibility in Washington State for preventing and planning for oil spills in state waters and organizing a rapid and coordinated response to oil and hazardous substance spills wherever they occur in the state.

Table 4.2-2 summarizes the federal and state agencies that provide oversight of prevention, preparedness, and response activities.

Table 4.2-2. Agency Oversight of Prevention, Preparedness, and Response Activities

Source of Oil Discharge or Other Hazardous Materials Release	Federal Agency Responsible for Prevention/ Preparedness	Lead Federal Agency for Response Actions	State Agency Responsible for Prevention/ Preparedness	Lead State Agency for Response Action
Terminal (Onsite)				
Facility (vessel loading facilities)	USCG	USCG	Ecology	Ecology
Facility (rail unloading facilities and storage tanks)	EPA	EPA	Ecology	Ecology
Offsite Transport				
PS&P	USDOT, PHMSA, FRA	EPA	Ecology	Ecology
Vessels	USCG	USCG	Ecology	Ecology

Source: Adapted from Ramseur 2012:22
USCG = U.S. Coast Guard; Ecology = Washington State Department of Ecology; EPA = U.S. Environmental Protection Agency; PS&P = Puget Sound & Pacific Railroad; USDOT = U.S. Department of Transportation; PHMSA = Pipeline and Hazardous Materials Safety Administration; FRA = Federal Railroad Administration

4.2.1 What framework prevents incidents from happening?

Preventing a spill is the best strategy for avoiding damage to human health and the environment. Federal and state agencies share responsibility for establishing prevention guidelines. The U.S. Coast Guard (USCG) and U.S. Environmental Protection Agency (EPA) are responsible for implementing federal prevention plans for vessels and facilities (33 Code of Federal Regulations [CFR] 154, Operations Manual; 33 CFR 156, Oil and Hazardous Material Transfer Operations, 40 CFR 112, Spill Prevention, Control and Countermeasure Plans). USCG also regulates vessels and oil transfer operations over water. Ecology's Spill Prevention, Preparedness and Response Program regulates facilities that handle oil, tank vessels (tankers and tank barges) operating in Washington State waters, and oil transfer operations over water (Washington Administrative Code [WAC] 173-180 Facility Oil Handling Standards; WAC 173-184 Vessel Oil Transfer Advance Notice and Containment Requirements). Ecology inspectors may conduct vessel and facility inspections to ensure compliance with state pollution prevention requirements. Federal and state laws also require specific facility, vessel, and rail car design elements to prevent and contain spills and operational measures to reduce the risk of a spill and to contain it immediately. Detailed information on the regulatory requirements for spill prevention is provided in Appendix B, *Laws and Regulations*.

4.2.1.1 Terminal (Onsite)

Facilities that store and handle oil and hazardous substances must meet federal and state design standards, equipment, and training requirements to prevent pollutants from reaching the environment. Facilities must submit operation, oil transfer, spill prevention, and training plans to federal and state agencies prior to beginning operations. Facility operators must adhere to specific standards for facility operations, including oil transfers, and ensure that all personnel are appropriately trained.

4.2.1.2 Rail

The U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration (PHMSA) adopted a final rule in 2015 that defines and regulates high-hazard flammable trains. The final rule implements new safety standards for trains that would be used to transport oil (80 *Federal Register* [FR] 26643). The final rule revises the Hazardous Materials Regulations (49 CFR 171–180) to define a high-hazard flammable train as a single train that contains 20 or more loaded tank cars of Class 3 (flammable liquid) materials in a continuous block, or 35 or more loaded tank cars distributed throughout a train. This rule affects crude oil and ethanol primarily as they are the only Class 3 materials transported in trains consisting of 20 cars or more. The primary intent of the revision is to update and clarify the regulations to prevent and mitigate the consequences of a train incident involving flammable liquids, should one occur.

Additionally, new tank cars constructed after October 1, 2015, are required to meet enhanced design or performance criteria for thicker walls. Existing tank cars must be retrofitted on a prescriptive retrofit schedule.

4.2.1.3 Vessel

Vessel operators must submit oil or hazardous material transfer plans and spill response plans. Ecology, EPA, and USCG conduct inspections of facilities, vessels, and transfer operations to ensure the plans are being followed. Vessels transporting oil have required construction design features (double bottoms and sides), mechanical measures (oil discharge monitoring systems and emergency shutdown devices), and navigational equipment (depth sounders and electronic position fixing devices to verify position and prevent collisions or groundings) that contribute to the prevention of oil spills to water. If oil is spilled from a tank vessel during loading or offloading, each loading manifold and each transfer connection point has a containment area. The containment is designed according to the size of the transfer hose to capture small spills and prevent the spill from reaching the water.

4.2.2 What framework prepares for an incident?

Federal and state regulations identify steps to prepare for an incident. Similarly, vessel and rail operators as well as facility operators are required to develop contingency plans to describe their ability to respond to spills (33 CFR 155, Vessel Contingency and Response Plans; 49 CFR 130, Rail Oil Spill Response Plans; WAC 173-182, Oil Spill Contingency Plan Requirements). The applicant must demonstrate that they have access to oil spill response equipment (e.g., boom) and storage necessary to contain and clean up the oil. Vessel, rail, and facility operators who have a contingency plan often use contractors to provide response equipment and response support teams. The adequacy of contingency plans is tested through scheduled and unannounced drills.

The National Contingency Plan, the Northwest Area Contingency Plan, local response plans, facility plans, and transportation regulations provide coordinated preparation for an oil spill or hazardous substance release. These contingency plans establish roles and responsibilities, identify resources, and identify response procedures to protect life and to reduce and mitigate the effects of the discharge of a pollutant on the environment and property. Contingency plans typically have four major elements.

- Hazard identification

- Vulnerability analysis
- Risk assessment
- Response actions

The following sections summarize the contingency plans that prepare for an incident. Detailed information on the regulatory requirements for spill contingency planning is provided in Appendix B, *Laws and Regulations*.

4.2.2.1 National Contingency Plan

The National Contingency Plan is a multiagency plan for governmental responses to oil spills. The National Contingency Plan establishes national response capability and overall coordination among the responders and contingency plans for oil spills through the National Response System (Section 4.2.3.1, *National Response System*). The National Response System consists of three organizational levels: national, regional, and local at the facility. If an oil spill or a hazardous material response incident escalates beyond the limits of state resources, additional federal assets are available and can be requested for an incident.

Under the National Contingency Plan, the federal on-scene-coordinator is designated as either USCG or EPA, depending on the location of the spill. Ecology is the designated state on- scene coordinator for spill response (RCW 90.56.020). The Washington Emergency Management Department is the designated state on-scene coordinator for natural disasters. The Washington State Patrol or state fire marshal is the designated state on- scene coordinator for fires.

4.2.2.2 Northwest Area Contingency Plan

The Northwest Area Contingency Plan is the planning framework for oil and hazardous substance spill response in Washington, Idaho, and Oregon. This plan is developed and implemented by federal, state, and local agencies. The plan includes but is not limited to the following elements.

- A description of the area covered by the plan, including the areas of special economic or environmental importance that might be damaged by a spill.
- Roles and responsibilities of an owner or operator and of federal, state, and local agencies in spill response and in mitigating or preventing a substantial threat of a discharge.
- A list of equipment (including firefighting equipment) and personnel available to respond to oil spills.
- Site-specific geographic response plans (GRPs).

GRPs are part of Northwest Area Contingency Plan. Each plan is written for a specific area (e.g., the Chehalis River or Grays Harbor) and includes tactical response strategies tailored to a particular shore or waterway at risk of injury from oil. GRPs have two main objectives: to identify sensitive

resources at risk of injury from oil spills and to direct response actions related to sensitive resource protection during the initial hours of a response.[1]

These plans help coordinate response efforts by the responsible party and federal and state agencies. Strategies in the plan are deployed by responders after the immediate concern of controlling and containing the source of a spill has been addressed. GRPs contain maps and descriptions of natural, cultural, and economic resources and identify strategies to reduce harm to those resources. They also prioritize which response strategies should be implemented based on the location of the spill.

- **Grays Harbor Geographic Response Plan.** This GRP defines information specific to the entire Grays Harbor estuary (the mouth of the Chehalis River to the east, the North Bay, and the South Bay) and the major islands within the estuary (Goose, Sand, Whitcomb, Grass, Laidlaw, and Rennie Islands) plus everything encompassed by these features.
- **Chehalis River Geographic Response Plan.** This GRP was completed in June 2015. The plan includes waters upstream of the eastern boundary of the Grays Harbor GRP near Cosmopolis and covers 120 miles of the river as it winds east/southeast to Centralia and Chehalis, then west to the South and West Forks of the Chehalis River.

4.2.2.3 Local Response Plans

Emergency response planning is managed through the local emergency planning committees, which consist of representatives from local government, emergency response officials, environmental and citizen groups, industry and other interested parties. Grays Harbor, Lewis, and Thurston Counties each have a local emergency planning committee.

4.2.2.4 Imperium Terminal Services Integrated Contingency Plan

The applicant has a USCG-approved operations manual, an Ecology-approved prevention plan, facility operations manual, training and certification plan, and an integrated contingency plan meeting federal and state requirements for current operations related to the storage, handling, and transfer of petroleum and nonpetroleum oils (biodiesel, diesel, and vegetable oil) and other hazardous substances (methanol, sodium methylate, and sulfuric acid). The Imperium Terminal Service Integrated Contingency Plan includes facility operations and dock operations. Additional information on Imperium Terminal Service's current planning framework is discussed in Chapter 3, Section 3.14, *Hazardous Materials*. The federal and state requirements would apply to the proposed action and the existing plans would need to be revised and resubmitted to the appropriate agencies.

4.2.2.5 Rail and Vessel Oil Spill Plans

PS&P does not currently transport oil in bulk and, therefore, does not have an oil spill response plan. Prior to transport of oil in bulk, PS&P would be required to submit an oil spill response plan to the Federal Railroad Administration for approval. PS&P would not be required to submit a

[1] Geographic Response Plans are available on the Department of Ecology's website at http://www.ecy.wa.gov/programs/spills/preparedness/GRP/index.html

comprehensive oil spill response plan because the tank cars are below the capacity limit;[2] however, PS&P would be required to submit a contingency plan to Ecology once regulations are developed by the State following new legislative direction from the 2015 Washington Legislature (ESHB 1449).

The final rule issued by PHSMA (80 FR 26643; 2015) establishes notification procedures for railroads. Specifically, the revised rule requires railroads to notify Washington State and state, local, and tribal officials with appropriate contact information. These entities may request information related to the routing of hazardous materials through their jurisdictions. This rule replaces the earlier order to notify state emergency response commissions or other appropriate state-delegated entities about the operation of oil trains through their states. The rule became effective July 7, 2015, when the information-sharing portion of the routing requirements went into full effect. Facilities will be required to report crude oil delivery by rail to Washington State once rules are adopted (ESHB 1449, 2015). State officials will then provide the information to local first responders and to the public quarterly in an aggregated form on the state website.

Although it is not known which vessel operators would be transporting the proposed liquids related to the proposed action, vessels operating in the study area would be required to have USCG-approved operations manuals and federal and state contingency and response plans consistent with the regulations listed in Table 4.2-1.

4.2.2.6 Drills and Exercises

State oil spill contingency plan holders must meet federal and state requirements to plan and carry out drills and exercises in accordance with 33 CFR 154 and 155 (Section 154.1955 for facilities and Section 155.1060 for vessels) and WAC 173-182 so that all components of the contingency plan are exercised at least once every 3 years. USCG and EPA are responsible for implementing the federal preparedness drill program. Ecology's Spills Program reviews and approves contingency plans and conducts drills and exercises. Washington State follows a modified triennial cycle for drills, as found in the federal National Preparedness for Response Drill Program to test each component of the plan. The following drills are included in each 3-year cycle (WAC 173-182-710 Type and Frequency of Drills).

- Tabletop[3] drill every year.
- Equipment deployment drills, two per year. These include deployments for the GRPs and equipment used for the response. Response to land based spills, emergency shut offs and initial safety assessment are also tested in deployment drills.
- Unannounced drills as initiated by Ecology.
- Wildlife deployment drill once every 3 years for wildlife equipment and handlers.

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[2] The Federal Railroad Administration, Pipeline and Hazardous Materials Safety Administration, and U.S. Department of Transportation are proposing to revise the requirements for federal oil spill response plans from railroads. Federal regulations only require comprehensive response plans for spills from carriers of individual rail tank cars with individual capacities of more than 42,000 gallons. Under the proposed change, PS&P would be required to develop comprehensive, rather than the currently required basic response plans (79 FR 45080).

[3] Tabletop drills involve bringing key personnel together to discuss how to implement a contingency plan using different scenarios.

- Tank vessel "umbrella plans," including Washington State Maritime Cooperative, once every 3 years.

4.2.3 What framework provides responses to an incident?

Oil spill and hazardous material spill response and contingency plans are formalized at the national, regional, state and facility level. Local and state first responders will likely be the first to respond to an incident (Table 4.2-2). The response framework includes a well-established and coordinated system for notification and evaluation of an incident, including having appropriate resources available and deployed. If an incident occurs, the best approach for containing and controlling a spill or fire is to respond rapidly, aggressively, and in a well-coordinated manner. A response will be more likely to meet these standards if response measures have been planned ahead of time.

4.2.3.1 National Response System

The federal National Response System is a scalable, flexible, and adaptable guide for responding to oil and other hazardous material spills. The system coordinates key roles and responsibilities across the nation. The National Response System provides a team of trained personnel for the federal on-scene coordinator. Team members have received specialized training for oil spill and hazardous materials releases.

Responses are managed using the National Incident Management System. This system establishes unified command structure, which includes federal, state, local on-scene-coordinators, and tribal and agency representatives with jurisdiction. Within the unified command structure, the representatives make decisions as a team, sharing resources and information to mitigate the situation. The unified command structure is used for emergency response, fire, disaster, wildfire, and law enforcement operations. It provides an effective framework for responding to various incidents.

4.2.3.2 State and Local First Responders

Ecology response teams are based in Bellingham, Bellevue, Olympia, Vancouver, Yakima, and Spokane. These teams are available year-round, 24 hours a day, to respond to incidences.

Local and state fire, police, or emergency personnel are likely to be the first responders to an incident, whether at the terminal, on the PS&P rail line, or in the harbor. While there are several fire departments in the study area, none of the fire departments has specifically designated hazardous material teams. A recent Washington Emergency Management Division survey of local fire departments and emergency managers showed that "35% of respondents (statewide) do not have access to a Type I Hazardous Response Team and 12% have no access to any type of hazardous response team at all" (Washington State Department of Ecology 2015). Fire departments would respond to emergencies and request additional assistance using their normal procedures.

4.2.3.1 State and County Comprehensive Emergency Management Plan

The Washington State Comprehensive Emergency Management Plan describes how state agencies work together to respond to emergencies. The Washington State Patrol investigates reports of fires and hazardous material incidents through the director of fire protection or the state fire marshal.

The Washington State Emergency Management Department and Ecology are also notified of these incidents.

The Grays Harbor County Department of Emergency Management maintains the County's Comprehensive Emergency Management Plan (Grays Harbor County undated), which provides guidance for local fire departments and other agencies that would respond to an oil spill or hazardous material incident in the study area.

4.2.3.2 Spill Notification Requirements

Oil and hazardous substance spills must be reported under federal and state law. The spiller is always responsible for reporting a spill. Any spill that causes any of the following conditions must be reported to federal and state agencies and appropriate spill response actions must be taken.

- A violation of applicable water quality standards.
- A film, sheen, or discoloration on the surface of the water or adjoining shorelines.
- A sludge or emulsion deposited beneath the surface of the water or on the adjoining shoreline.

The entity responsible for the spill (often referred to as the responsible party) must make the notifications and take response actions.

- **Facilities**. Any person owning or operating the facility.
- **Rail.** The railroad owner or operator.
- **Vessels.** In the case of a vessel, any person owning, operating, or demise chartering the vessel.

Under federal law, spills must be reported to the National Response Center, a 24-hour operations center that gathers information and notifies appropriate agencies, including state agencies.

Under state law, Ecology must be notified when any amount of regulated waste or hazardous material that poses an imminent threat to life, health or the environment is released to the air, land, or water, or whenever oil is spilled on land or to waters of the state. Ecology responds to emergency incidents involving releases and spills of oil and hazardous materials that have the potential to harm the natural environment and affect public health. Under state regulations, facilities (WAC 118-40-300) and vessel (WAC 88.46.100; RCW 90.56.280) owners or operators must notify the state immediately of all hazardous material releases and oil spills. This notification requirement is in addition to the federal notification requirement.

The Washington State Oil Spill Contingency Plan (WAC 173-182) requires that the applicant's contingency plan include procedures to notify appropriate parties immediately when a spill has occurred. The plan must identify who is responsible for implementing the notification process. The plan will include a list of the names and phone numbers of required notifications to government agencies, response contractors, local government, tribes and spill management team members and will have a clear order of priority for immediate notification.

4.2.3.3 Oil Spill Response Contractors

The applicant must maintain an oil spill response contractor for oil spill response. These contractors provide spill response equipment and trained personnel. The Western Response Resource List outlines various types of response equipment maintained by participating private and public response organizations in the Pacific Northwest. Additional resources from across the United States are available as needed.

4.3 Risk Considerations

Impacts of a spill of oil or any hazardous material, should one occur, depend on multiple factors, such as the chemical properties of the spilled material and the environmental conditions at the time of the spill. These factors are described below.

4.3.1 How do the characteristics of spilled materials contribute to potential impacts?

The proposed action would involve the handling, storage, and transport of bulk liquids including crude oil. These materials, described in the following subsections, have unique characteristics that contribute to spill risks and impacts.

4.3.1.1 Material Characteristics

Hazardous Materials Classification

The federal hazardous material regulations (49 CFR 171–180) require the proper classification and characterization of a material, which, in turn, determine its transportation requirements. Hazardous materials are categorized by analysis and experience into hazard classes and packing groups based on the risks they present during transportation. Characterization includes identifying the effects a material has on both the reliability and safety of the packaging that contains it. Crude oil's properties and characterization may vary considerably based on time, location, method of extraction, temperature at time of extraction or processing, and the type and extent of processing of the material (Section 4.3.1.2, *Crude Oil*).

Currently, as shipped, crude oil is classified as Class 3 flammable liquid. The U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration (PHMSA) issued a safety alert on January 2, 2014, warning of potential crude oil variability. The alert emphasized conducting proper and sufficient testing to ensure accurate characterization and classification. The safety alert expressed PHMSA's concern that unprocessed crude oil may affect the integrity of packaging or present additional hazards related to corrosiveness, sulfur content, and dissolved gas content. The final rule issued by PHSMA in May 2015 (80 FR 26643) requires accurate classification and enhanced standards for transportation of highly flammable materials, including Bakken crude oil. The specifics of these requirements and the implications for safety in the study area are discussed in Section 4.5, *Environmental Health Risks—Rail Transport.*

Flash Point

Flash point is the temperature at which a fuel will ignite when exposed to an open flame. The flash point is used as an index of fire hazard for hazardous materials. A Class 3 flammable liquid has a flash point of not more than 140°F (60°C) (49 CFR 173.120). Bakken crude oil has a flash point of less than 73°F (23°C). Bitumen has a high flash point of 304°F (151°C). However, diluted bitumen would be expected to have a lower flash point because diluents (thinning or diluting agents) are added to make bitumen less viscous (Section 4.3.1.2, *Crude Oil*). Diluent typically makes up 20 to 30% of the volume of diluted bitumen. The flash points of various oils are presented in Table 4.3-1.

Table 4.3-1. Flash Points of Petroleum Products

Material	Flash Point
Bitumen	304°F / 151°C
Biodiesel	266°F/ 130°C
Bakken crude oil	73°F or 23°C
Heavy crude oil (conventional)	< 54°F / < 12°C
Light sweet crude	16°F/ -9°C
Diluted bitumen	-31°F/ -35°C
Gasoline	-45°F/ -43°C

Source: Jokuty 2005 in Tsaprailis 2014

Persistent and Nonpersistent Oils

Persistence describes how long oil persists in the environment. Persistence is one of many factors that determine the impacts of an oil spill and the type and effectiveness of the recovery methods employed. Therefore, along with the amount of oil spilled, the physical characteristics of the area, and the local weather conditions, the persistence of the oil is incorporated into the development of response plans and evaluation criteria used by Washington State, the U.S. Coast Guard (USCG), and the U.S. Environmental Protection Agency (EPA). The definitions of persistent and nonpersistent oils are listed in Table 4.3-2.

Table 4.3-2. Definitions of Oil Persistency for Response Plan Regulations

Nonpersistent oils (Group I)	A petroleum-based oil that consists of hydrocarbon fractions: At least 50% of which, by volume, distills at a temperature of 340°C (645°F) At least 95% of which, by volume, distills at a temperature of 370°C (700°F)
Persistent oils (Group II to Group V)	Group II: specific gravity less than 0.85 Group III: specific gravity equal to or greater than 0.85 and less than 0.95 Group IV: specific gravity equal to or greater than 0.95 and less than 1.0 Group V: specific gravity equal to or greater than 1.0

Generally, nonpersistent oils (Group I oils) such as diesel, kerosene, and gasoline have lower viscosity and dissipate quickly in the environment. However, rapid dissipation does not diminish the acute toxic effects of such oils on organisms if materials are spilled in higher quantities or on public health if the fumes are confined.

Persistent oils (Groups II through V) are heavier oils with higher viscosity that persist longer in the environment. Crude oil is a persistent oil. Bakken crude oil is a Group II oil and diluted bitumen is a Group IV or V oil (Section 4.3.1.2, *Crude Oil*).

Oil weathering (how the physical and chemical characteristics of the spilled oil change over time) can affect the persistence of oil in the environment. The processes involved in weathering, such as spreading, evaporation, dispersion, emulsification, dissolution, photo-oxidation, sedimentation and sinking, and biodegradation are described in Appendix N, *Oil Spill Modeling*.

4.3.1.2 Crude Oil

Bakken Crude Oil

As discussed in Chapter 3, Section 3.14, *Hazardous Materials*, Bakken crude oil is typically characterized as a light crude oil; it contains more volatile components and flows more easily (is less viscous) than heavier types of crude oil. It would be expected to float on both fresh water and salt water (International Tanker Owners Pollution Federation Limited 2011a:2). In general, Bakken crude oil is moderately toxic. It contains a moderate amount of volatile components along with some persistent compounds that can cause long-term contamination of surface and subsurface waters (Washington State Department of Ecology 2015:389). This type of oil leaves a residue of up to one-third the volume of the spill after a few days, and it is generally possible to clean it using appropriate response measures. Under response plan regulations (Table 4.3-1), Bakken crude oil is considered a Group II Persistent Oil.

Diluted Bitumen

The bitumen imported into the United States is produced from Canadian oil sands. Bitumen is a highly viscous, nearly solid type of petroleum that occurs in natural deposits along with clay, sand, and water. For transport, bitumen is diluted with diluents such as natural gas condensates, naphtha, or other light oils and called diluted bitumen (also known as *dilbit*) (National Research Council 2013: 34-35 and 47).

Although dilbit is classified as a crude oil, the added diluent means that, when spilled into the environment, dilbit will behave differently than other heavy oils (National Oceanic and Atmospheric Administration 2015). Under response plan regulations, dilbit is treated as a Group III Persistent Oil (POLARIS Applied Sciences 2013:4). Group III oils have a specific gravity equal to or more than 0.85 and less than 0.95. The specific gravity of fresh water is 1, which means that dilbit is less dense than fresh water and, if spilled in the environment, would initially float in fresh water and salt water.

If spilled dilbit were to remain in the marine environment, the lighter components would evaporate and, as experienced during a 2010 spill of dilbit (the 2010 Enbridge spill in the Kalamazoo River, Michigan), the leftover residue becomes denser than what was spilled initially.[1] The responders for the Enbridge spill found that after the oil remained in the environment for a few hours or days, it sank because its composition changed (weathered).[2] Oil that sinks below the surface of the water is harder to see and harder to recover.

4.3.1.3 Other Proposed Bulk Liquids

Refined petroleum products transported under the proposed action would include gasoline, kerosene, naphtha, jet fuel, and would be considered volatile distillates (Washington State

[1] The 2010 Marshal Spill (Kalamazoo River in Kalamazoo, Michigan) from the Enbridge Pipeline is the only documented spill of dilbit into an aquatic setting in the United States. The spill occurred after a 30-inch pipeline ruptured on Monday, July 26, 2010, near Marshall, Michigan. The release was estimated at 843,000 gallons.
[2] During a study conducted in Gainford, Alberta in 2013 over a 10-day period, spilled dilbit crude oil did not submerge or sink under simulated weather conditions (Witt O'Brien's et al. 2013: 61). However, the study authors note that after weathering (particularly in a fresh water environment) and with the addition of sediment dilbit could become submerged (Witt O'Brien's et al. 2013: 41 and 60).

Department of Ecology 2015:389). In the environment, these lighter oils will initially float on water and gradually evaporate, disperse, or dissolve in the water.[3] Specific evaporation and dispersion rates are unique to each spilled product and weather conditions but general estimates are that 40 to 65% of the oil spilled will evaporate within 2 hours to 2 days and that 25 to 50% will disperse during the same time frame (National Oceanic and Atmospheric Administration 1997).

Due to their high concentrations of volatile compounds, these distillates have a high acute toxicity and can cause localized, severe impacts on surface and subsurface waters. Cleanup of such products is difficult due to their rapid evaporation rate. Under response plan regulations, these products are considered Group I Nonpersistent Oils.

Refined products such as no. 2 fuel oil contain fewer volatile compounds and are characterized as light oils (Washington State Department of Ecology 2015:389). Such oils float on both fresh and salt water and would be similar to Bakken crude oil when spilled in such waters. Under response plan regulations, these products are considered Group II Persistent Oils.

Products such as no. 6 fuel oil and vacuum gas oil have relatively low levels of volatile components and are considered heavy oils. They behave more like bitumen when spilled in fresh or salt water. Under response plan regulations, these products are considered Group IV Persistent Oils.

The nonpetroleum fuels that could be transported through and stored at the facility include ethanol, renewable jet fuel, renewable diesel, used cooking oils, and animal fats. Vegetable oils and animal fats that were previously used for cooking or other purposes may also be handled, as well as products such as renewable diesel and jet fuels that are derived from these oils and fats by refining. Many of these oils have similar characteristics to petroleum oils, including similar densities and viscosities, limited solubility in water, and specific gravities that are typically lower than fresh or salt water and would be expected to behave similarly in water (Davis et al. 2001).

Ethanol is a colorless, flammable liquid that is highly volatile. With a specific gravity of approximately 0.79, ethanol is completely soluble in water. It is a naturally occurring small-chain alcohol also known as ethyl alcohol or grain alcohol. Ethanol is used in the production of alcoholic beverages, as a solvent, and for a variety of other industrial uses such as fuel, fuel additive, and feedstock for the manufacture of other chemicals. It is primarily produced by the fermentation of carbohydrates, mainly corn (Malcolm Pirnie 1998). Two types of ethanol are typically used for fuel or fuel blending: fuel ethanol and denatured fuel ethanol (Interstate Technology Regulatory Council 2011:6). Fuel ethanol contains impurities common to its production whereas denatured fuel ethanol includes hydrocarbon denaturants, which are added to make it unfit for beverage use. Because of federal regulations, producers of ethanol for use in fuel in the United States do not distribute their product in a nondenatured form; therefore, denatured fuel ethanol is the typical ethanol fuel stock distributed from manufacturing locations to bulk storage locations (Interstate Technology Regulatory Council 2011:6).

[3] Dispersion: the distribution of spilled oil into the upper layers of the water column by natural wave action or application of chemical dispersants.

4.3.2 What environmental factors contribute to potential impacts from an incident?

Factors such as the amount of oil spilled, product characteristics and persistence, physical characteristics of the area, local weather conditions, and water flow conditions can influence the outcome of a spill. These factors are important to consider for planning and responding to spills. This section provides information for these factors and describes how they influence the spill consequences.

4.3.2.1 Air Dispersion

Volatile vapors released from a spill may create flammable atmospheres or inhalation hazards. Air monitoring should be implemented as soon as possible by first responders. Responders should wear self-contained breathing apparatus to avoid potential exposure when responding. Climatic patterns that may affect the dispersion of vapors in the study area are presented in Appendix D, *Air Data*.

4.3.2.2 Weather Conditions

Weather conditions can influence the movement and spread of oil in the environment. Weather in the study area is typically windy and rainy in winter and relatively cool in summer, with some periods of fog in summer and, to a lesser degree, in the fall. Wind and fog conditions are often local to Grays Harbor. Winds recorded at Bowerman Airport (in Grays Harbor) are generally from the east or northeast during the winter and the west or southwest or directly from the south (less frequently) during the summer. The strongest winds, more frequent during winter storms from October through March, reach gale force (34 to 40 knots) 3 to 6% of the time. Average wind speeds year round are generally 9 to 10 miles per hour. Storms are less frequent in the spring and summer.

In the winter, rain falls on about 15 to 25 days per month. Rainfall diminishes to 8 to 15 days per month in the spring and 5 to 10 days per month in the summer. Average temperatures range from 35 to 50°F in midwinter to a high of 68 to 69°F in the hottest summer months (July to August).

Weather near the lower Chehalis River is similar to weather in Grays Harbor. Further inland along the river toward Centralia, the weather is similarly mild. The interior of western Washington has slightly less measurable rainfall on record than along the coast (150 days each year versus 190 days along the coast) and temperatures are generally 10 degrees warmer in the summer months.

4.3.2.3 Water Flow

In addition to fog and swells caused by high winds, water flow conditions in the Bar Channel Reach of the Grays Harbor Navigation Channel (at the entrance of the harbor) vary depending on ebb or flood tidal currents, speed of the Chehalis River runoff, wind, and ocean swells just outside the entrance. Average current velocity is about 1.9 knots on the flood and 2.8 knots on the ebb but velocities have been known to reach 5 knots. The direction of the current near the bar can be erratic, running north close inshore and south offshore. In the harbor, current velocities in the navigation channels seldom exceed 3 knots. The tidal cycle in Grays Harbor is mixed semidiurnal (two high tides and two low tides in a 24-hour period with varied heights), which means that tidal height relative to mean low water ranges from less than 1 foot to almost 9 feet twice a day.

The discharge rate (flow) in the Chehalis River Basin is characterized by seasonal variation, with sharp rises of relatively short duration from October to March corresponding to the period of heaviest rainfall (U.S. Army Corps of Engineers 2003). A low flow of 731 cubic feet per second is based on the period of record (1952 to 2013) for the U.S. Geological Survey stream gauge at Porter, Washington. Higher flow events range from a 2-year flood (31,000 cubic feet per second) to a 100-year flood (83,000 cubic feet per second). Flow velocities for these flow events in the lower Chehalis River average 1.3 cubic feet per second for the low flow case, 4.0 cubic feet per second for the 2-year flow case, and 4.8 cubic feet per second for the 100-year flow case. These average velocities are influenced by the shallow gradient of the river and the backwater effect of the tidally influenced portion of the river. While these velocities can vary based on the tides, they are typical for a river with similar topography and hydrologic characteristics.

4.4 Environmental Health Risks—Terminal (Onsite)

This section addresses the potential environmental health risks associated with operations at the terminal (onsite). This section first describes the environmental health risks that would exist under the no-action alternative to provide context for how risks would change with the addition of the proposed action. It then describes the potential risks related to oil spills, fires, and explosions associated with terminal operations under the proposed action. This section describes the existing planning, preparedness, and response framework intended to address risks at the terminal and identifies additional applicant mitigation measures to further address risks. The section concludes with a discussion of the unavoidable and significant adverse impacts of the proposed action and an explanation of financial responsibility for emergency response and cleanup activities if an incident occurred at the terminal.

4.4.1 What are the existing risks?

This section describes the potential environmental health risks that could occur under the no-action alternative, which would represent a continuation of the existing risks. The environmental health risks at the existing facility include the potential for exposure of people and the environment to the liquids and chemicals that are currently stored, handled, and transported on site. Exposure to these materials could occur due to incidents caused by human error, equipment failure, or in extreme cases, natural disasters, such as earthquakes or other seismic-related events. Depending on the circumstances of an incident and the properties of the chemicals, the people, plants, and animals in the environment could suffer direct toxic impacts or secondary impacts from exposure to vapors. In some cases, incidents could result in the potential for fires or explosions.

Under the no-action alternative, the biodiesel production facilities would continue similar to existing conditions. As described in Chapter 3, Section 3.14, *Hazardous Materials*, the environmental health risks would be related primarily to exposure to hazardous materials such as fuels used in facility vehicles, solvents, cleaning agents, paints, oil filters, used oil, batteries, aerosol cans, and fire-fighting foam. Spills of these chemicals and those stored in bulk, including methanol vegetable oil, sulfuric acid, liquid nitrogen, sodium methylate, biodiesel, and glycerin, could occur as the result of human error (e.g., improper use, not following required handling and storage protocols) or equipment failure (e.g., leaking vehicles or minor hose leaks). As noted in Section 3.14, most spills that occurred under these circumstances would be expected to be relatively small and easily contained.

The greatest potential for larger-scale spills would be related to incidents involving materials that are handled, stored, or transported in bulk. Under the no-action alternative, these would continue to include methanol, vegetable oil, sulfuric acid, liquid nitrogen, sodium methylate, biodiesel, and glycerin. During existing operations, the greatest potential for impact from larger-scale spills would be associated with vessel transfers. This is because vessels carry the greatest volumes at one time and they travel and transfer oil exclusively over water where spills are not as easily contained.

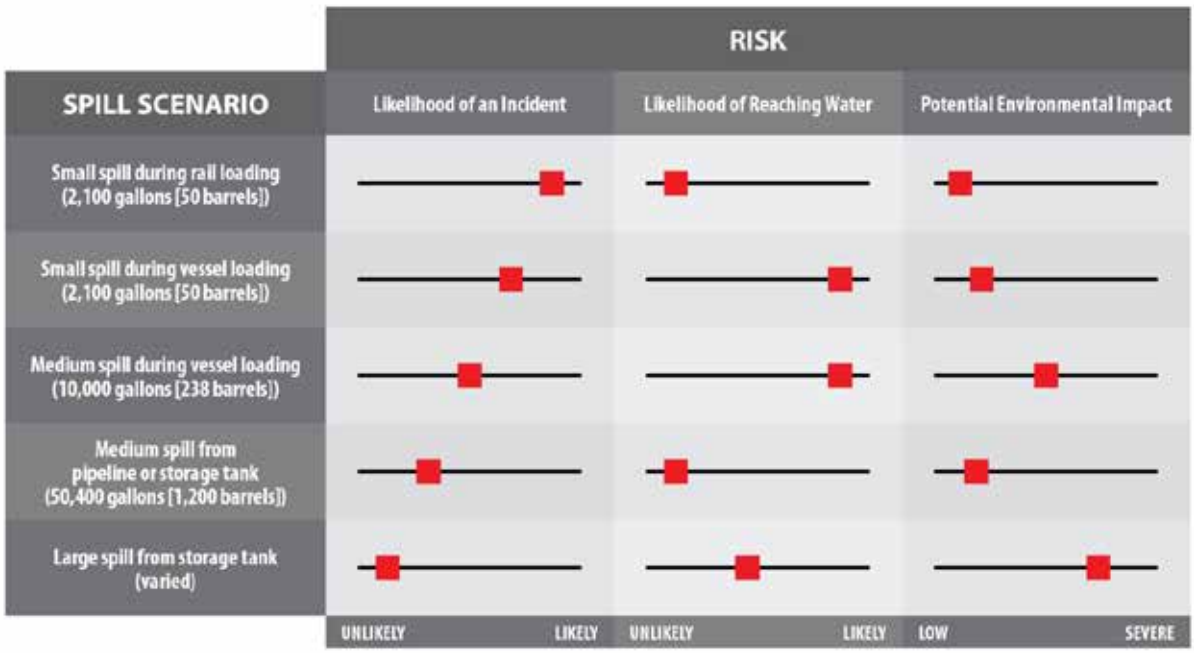
As it is not possible to predict the timing or magnitude of an incident, the following spill scenarios were considered to provide an understanding of risks under the no-action alternative.

- **Small rail-unloading spill scenario:** spill of 2,100 gallons (50 barrels) on the project site.

- **Small vessel-loading spill scenario:** spill of 2,100 gallons (50 barrels) into Grays Harbor.
- **Medium vessel-loading spill scenario:** spill of 10,000 gallons (238 barrels) into Grays Harbor.
- **Medium pipeline or storage tank spill scenario:** spill of 50,400 gallons (1,200 barrels) on the project site.
- **Large spill from storage tank failure scenario:** spill of 2 million gallons (48,000 barrels, contents of entire storage tank).

The relative risks of these spill scenarios are shown graphically in Figure 4.4-1 and summarized below. The potential impacts of exposure to spills are addressed in Section 4.7, *Impacts on Resources.*

Figure 4.4-1. Environmental Health Risks from Potential Spills at the Terminal (Onsite)—No-Action Alternative



The likelihood of each spill scenario occurring under the no-action alternative and related risks is summarized below.

- The **small rail-unloading spill scenario** could occur once in 42 years. Reported data have shown that most of these spills would be fewer than 200 gallons. Because the spill amount is less than the unloading area containment, the spill is expected to be contained.
- The **small vessel-loading spill scenario** could occur once in 140 years. Reported data have shown that most of these spills would be fewer than 200 gallons. Some vegetable oil or biodiesel is likely to be contained on the facility, on the deck of the vessel, or on the dock but could spill to surface waters or to the ground.

- The **medium vessel-loading spill scenario** could occur once in 2,300 years. A small amount of the vegetable oil or biodiesel would be contained on the facility or vessel but the remainder could spill to water.
- The **medium pipeline or storage tank spill scenario** could occur once in 714 years. This volume of spill could occur in the event of a pipeline rupture or a smaller storage tank failure. Depending on the event, it is possible that the existing containment areas would contain the majority of a spill of this size; however, if extensive infrastructure damage were to occur, widespread environmental damage could occur.
- The **large storage tank spill scenario** could occur once in 14,000 years. This release of the entire contents of a storage tank resulting from storage tank or containment failure could occur as a result of a material failure, containment failure, or a seismic or tsunami event. Some of the vegetable oil or biodiesel would be caught in the containment area but the remaining oil could spill to land or water. If extensive infrastructure damage were to occur, widespread environmental damage would be likely.

The impacts of releases of these chemicals into the environment are addressed in Chapter 3, Section 3.14, *Hazardous Materials*. For additional details about the analysis of risks under the no-action alternative, see Appendix M, *Risk Assessment Technical Report*.

4.4.2 What are the potential risks?

Under the proposed action, additional risks would include the possibility of spills of the proposed bulk liquids, including crude oil that could adversely affect people and the natural environment. The greatest potential for larger-scale spills would occur during the proposed rail unloading, storage, and vessel-loading activities. Under the proposed action, the likelihood of a spill occurring would be greater compared with the no-action alternative, primarily because of the increased number of storage tanks and corresponding increased total volume of bulk liquids stored on site and increased rail and vessel-unloading and loading activities. Additionally, there would be new environmental health risks related to the potential exposure of people and the natural environment to crude oil and the other proposed bulk liquids.

This section describes the proposed facilities and activities that could result in increased risks of a spill, determines the change in the likelihood of a spill occurring under the proposed action, identifies mitigating factors currently in place to minimize the impacts of an incident, and describes the potential extent of a spill and the response actions that would occur. This section also describes the risks of fires or explosions related to the proposed action and the response actions that would occur in the event of a fire or explosion at the project site.

Imperium currently has eight primary tanks, each with a capacity of up to 48,000 barrels. Under the proposed action up to nine 80,000-barrel storage tanks would be added to hold crude oil or the other proposed bulk liquids. The tanks are required to have containment areas able to collect the capacity of the largest tank plus precipitation. However, containment could fail in a catastrophic event. Leaks from the tank or piping within the containment would be expected to remain in the containment and be collected for proper disposal. Tanks are typically isolated using valves unless in use, so a leak or rupture from piping outside of the containment would likely be limited to the quantity of the substance in the piping.

Rail car and vessel unloading and loading would also occur under the proposed action. The rail unloading area would also include a containment area with a capacity to hold the contents of one rail car (typically 30,000 gallons) plus precipitation. Rail-unloading activities (up to approximately 43,800 times annually) would comprise the greatest number of active transfers because of the number of rail cars that must be unloaded on a daily basis. Spills could also occur during the vessel-loading activities (up to 200 loadings[1] annually) with releases directly to the water or to containment. Small-quantity containment areas are required at valve connections for transfer operations. Rail activities are more common than vessel activities and this higher frequency poses a greater potential for releases from unloading hoses or connection failures.

4.4.2.1 Oil Spills

Oil Spill Risk

Historically, no oil or hazardous materials spills to the water have occurred from the project site since the applicant began activities in Grays Harbor. In 2009, one biodiesel spill of 5,000 gallons occurred on site, and the oil was confined to the containment area with no impact on water. The cause for the spill was mechanical failure.

A summary of west coast oil spill data for 2014 reported 1,193 spills, of which 15 spills were over 10,000 gallons. More than 79% of the spills were to land. Over the past 13 years, the major spill causes were identified as equipment failure (55%) and human error (30%) (Pacific States/ British Columbia Oil Spill Task Force 2015).

Although no major spills have been reported at the project site, the proposed action would result in increased risks of such spills. As noted previously, it is not possible to predict the timing or magnitude of an incident; therefore, the following spill scenarios were considered to provide an understanding of risks under the proposed action.

- **Small rail-unloading spill scenario:** spill of 2,100 gallons (50 barrels) on the project site.
- **Small vessel-loading spill scenario:** spill of 2,100 gallons (50 barrels) into Grays Harbor.
- **Medium vessel-loading spill scenario:** spill of 10,000 gallons (238 barrels) into Grays Harbor.
- **Medium pipeline or storage tank spill scenario:** spill of 50,400 gallons (1,200 barrels) on the project site.
- **Large storage tank failure spill scenario:** spill of 3.36 million gallons (80,000 barrels, the entire contents of one full storage tank).

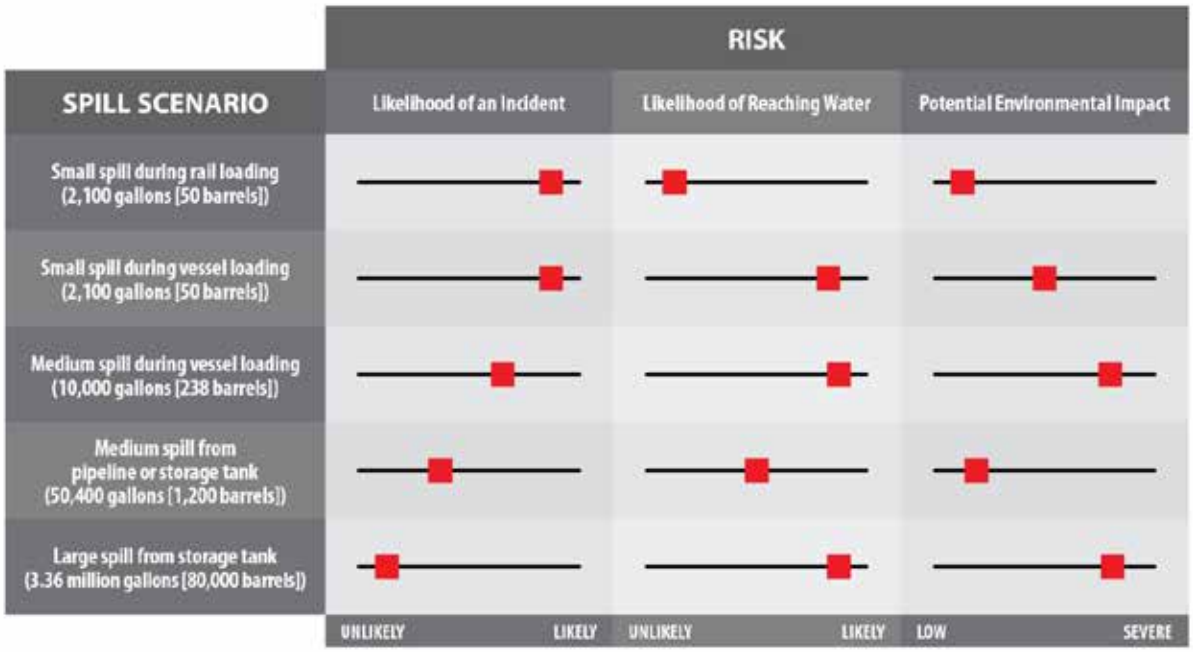
The proposed action would increase daily operations, particularly the frequency of loading vessels and unloading rail cars. As such, the proposed action would result in the potential for more frequent

[1] As noted in Section 3.17, *Vessel Traffic*, any combination of tank barges and tankers, including those listed in Table 3.17-9, could be used to transport bulk liquids from Terminal 1. For the purposes of this analysis, the maximum number anticipated would be associated with the use of all tank barges. As discussed in Section 4.6, *Environmental Health Risks—Vessel Transport*, reducing the number of vessel trips by using larger vessels would lower the likelihood of a spill; however, in the event that a spill occurred, the spill could be larger. Additionally, the number of proposed vessel trips includes those currently occurring.

spills of bulk liquids relative to the no-action alternative, although the orders of magnitude are very similar.

The likelihood of very large releases from storage tank failures would remain low. The relative risks are shown graphically in Figure 4.4-2 and summarized below. The potential impacts of exposure to spills are addressed in Section 4.7, *Impacts on Resources*.

Figure 4.4-2. Environmental Health Risks from Potential Spills at the Terminal (Onsite)—Proposed Action



The likelihood of each spill scenario occurring under the proposed action and related risks are summarized below.

- The **small rail-unloading spill scenario** could occur once in 6 years. The spill amount is less than the unloading area containment so the spill is expected to be contained.
- The **small vessel-loading spill scenario** could occur once in 5 years. Some oil is likely to be contained on the facility, on the deck of the vessel, or on the dock but could spill to surface waters or to ground.
- The **medium vessel-loading spill scenario** could occur once in 83 years. A small amount of the oil would be contained on the facility or vessel but the remaining oil could spill to water.
- The **medium pipeline or storage tank spill scenario** could occur once in 1,100 years. Depending on the cause of the event, it is possible that the existing containment areas would contain the majority of a spill of this size; however, if extensive infrastructure damage were to occur, widespread environmental damage could occur.

- The **large storage tank failure spill scenario** could occur once in 22,000 years. This release of the entire contents of a storage tank resulting from storage tank or containment failure could occur as a result of a material failure, containment failure, or seismic or tsunami event. Some of the oil would be caught in the containment area but the remaining oil could spill to land or water.

For more information about the likelihood of these spills occurring, see Appendix M, *Risk Assessment Technical Report*.

To provide additional information about the risks of a spill and to inform prevention, preparedness, and response planning, oil spill modeling was completed for a subset of the spill scenarios. As presented in Appendix N, *Oil Spill Modeling,* the modeling demonstrates that the movement of spilled oil in the harbor can vary dramatically, depending on the location of the spill, material spilled, weather conditions, and hydrologic flow conditions.

Depending on these conditions and assuming no efforts were taken to contain the spill, modeling showed that oil could move from the project site to the far shores of the estuary within 24 hours or could remain near the spill site. The potential impacts of exposure to spills on human health and the environment would vary depending on the specific circumstances of the spill. These impacts are addressed in Section 4.7, *Impacts on Resources*.

Oil Spill Prevention

As discussed in Section 4.2, *Applicable Regulations*, facilities that store and handle oil and hazardous substances must meet federal and state design standards, equipment, training, and operation requirements to prevent spilled oil or hazardous materials from reaching the environment. Washington State has specific regulatory spill prevention, training, and pollution containment equipment standards for Class 1 facilities such as large, fixed, shoreside facilities that transfer materials to or from tank vessels. The existing facility already operates as a Class 1 facility and is subject to Class 1 spill prevention, training and operational standards.

Storage Tank Containment

The proposed facilities would be designed and constructed in accordance with 40 CFR 112, 33 CFR 154, and WAC 173-180A. The applicant would be required to install appropriate containment and diversionary structures or equipment such as dikes, berms, and retaining walls to prevent discharged oil from reaching navigable waters. The containment must be capable of containing the contents of the largest tank plus precipitation.

Design Standards

State construction and design standards for facilities (WAC 173-180) include oil transfer requirements, containment boom, fixed lighting, effective voice communication requirements, emergency shutdown equipment and procedures, storage tank and pipeline construction and inspection standards, and hose and loading arm specifications. Oil and hazardous material pollution containment equipment, such as sorbent materials and boom, would be positioned in the facility and accessible to employees (33 CFR 154.545).

All hazardous substances must be accounted for in the facility design standards in accordance with state and federal laws and regulations to prevent incidents and to minimize the environmental

impact of incidents. For example, all storage tanks and rail car unloading areas would be protected with fire-fighting foam capabilities (foam blanketing fire protection). Tanks would be equipped with high-level alarms, over-pressure protection, floating roofs, and emergency overflows into containment (Imperium Terminal Services 2013:25). Floating roofs could provide vapor containment to reduce air toxics by sitting on the surface of the tank contents, reducing the potential for vapor generation.

Spill Containment Training

Washington State requires that a specific training and certification program be in place for certain employees at Class 1 facilities. The purpose of the training is to reduce the risk of oil spills due to human error (WAC 173-180-510). Personnel involved in oil transfers must be trained in emergency response and oil transfer procedures (WAC 173-180 Part E, Training and Certification and 33 CFR 154). Personnel are stationed near shutoff equipment to quickly stop the flow of oil in the case of a spill and begin notifications and initial responses.

Oil Spill Response

Applicant Contingency Planning

The site contingency plan required for the proposed action required of the applicant will provide specific oil spill response actions and will include information on the specific equipment, valves, pipelines, and loading arms. Typical actions for responding to a spill are as follows.

- Notify companies and agencies that are responsible for the cleanup effort.
- Get trained personnel and equipment to the site quickly.
- Ensure the safety of responders and the public.
- Define the size, position, and content of the spill; its direction and speed of movement; and its likelihood of affecting sensitive habitats.
- Stop the flow of oil, if possible, and preventing ignition.
- Contain the spill to a limited area.
- Remove the oil.
- Dispose of the oil once it has been removed from the water or land.
- Investigate immediate and contributing causes for the spill.
- Apply lessons learned to prevent future spills.

Geographic Response Plans

As mentioned in Section 4.2, *Applicable Regulations*, the Grays Harbor and the Chehalis River Geographic Response Plans (GRPs) contain specific response strategies in the event of an oil spill (from any source) into or threatening waters and related environmental resources within the study area. For example, the Grays Harbor GRP contains response strategies relevant to an oil spill that would affect the lower Chehalis River (including response strategies related to tributaries or

wetlands that connect to the river), the North and South Bays, and Bowerman Basin (near Grays Harbor airport). Response strategies for coastal shorelines along the Pacific Ocean west of Grays Harbor are also included (Ocean City, Ocean Shores, Westport, Cohasset Beach, and Grayland) in case of an oil spill that drifts outside of the harbor entrance or that leaks from a vessel located near the harbor entrance. The Chehalis River GRP geographically covers the river from Cosmopolis, picking up where the Grays Harbor GRP ends, and follows the river southeast to Centralia, concluding at Pe Ell.

GRPs are not the only actions taken in a response, for example spill containment and on water recovery are the first priorities and are not described in GRPs. Response strategies described in the GRPs encompass the placement of a boom to close off access of spilled oil into environmentally sensitive sites (such as the Oyhut Wildlife Recreation Area near the harbor entrance), to deflect oil moving on the river or within the harbor into a containment area for collection (with vacuum trucks and sorbent materials), or to divert oil away from areas that are sensitive and/or hard to clean. Culvert blocks or underflow dams are also response strategies presented in the GRPs to aid in shoreline protection and oil collection. The GRPs contain supplemental information related to the response strategies that support their implementation. For example, the Grays Harbor GRP includes a table with recommended boom lengths, appropriate boom deflection angles, and the number of required anchors to support boom placement for a range of different current speeds. Predesignated staging area locations (for equipment and personnel) and relevant logistics for their use are clearly described.

The response strategies are prioritized in the GRPs to reflect the sensitivity of threatened environmental resources or potential public health concerns (as in the case of spill proximity to populated areas or water intakes). In some cases economic considerations may dictate response priorities (for example preventing oil from affecting shellfish harvest areas or a marina). These priorities are considered prior to a spill and reflected accordingly in the GRPs to prevent a delay in the allocation of response assets during a spill response.

Each GRP identifies potential spill origin points in order to plan for a variety of potential spill sources. There is no attribution in the GRPs for the cause of the spill at the spill origin points. Each spill origin point has a multitude of associated response strategies within the GRPs due to the likelihood that spilled oil will spread on and flow with water until it is contained and removed. For example, the Grays Harbor GRP contains over 40 site-specific strategies to combat the spread of spilled oil from spill origin point designations GH-C, located near Grays Harbor entrance, and GH-B, located near the mouth of the Chehalis River, and in the lower southeast quadrant of Grays Harbor. These site-specific strategies are designed for individual areas, not for the entire Grays Harbor area.

In addition to the site-specific information contained in the GRPs, relevant information in other sections of the larger Northwest Area Contingency Plan (Section 4.2.2.2, *Northwest Area Contingency Plan*) supplements the site-specific strategies. For example, *Chapter 3000 – Operations* contains a section titled *Operational Safety Issues Associated with Bakken Crude Oil*. Another section, *Northwest Area Shoreline Countermeasures Manual and Matrices*, contains an in-depth description of 10 shoreline types (ranging from fine- to medium-grained sand beaches to salt and freshwater marshes) and appropriate cleanup considerations for each type.

4.4.2.2 Explosions

Explosion Risk

One explosion at Imperium Terminal Services was reported on December 2, 2009, when a 10,000-gallon tank containing heated glycerin exploded because of over-pressurization. The explosion damaged a 5,000-gallon tank of sulfuric acid (U.S. Environmental Protection Agency 2009 and Butorac pers. comm.). No one was injured and no sulfuric acid or glycerin reached the water because of the incident.

Many of the materials to be handled under the proposed action are flammable but they are generally in a liquid and not gaseous form. Typically, terminal activities resulting in a spill would have limited potential to result in ignition because terminals are designed to reduce ignition potential. Liquid materials would pool on the ground with only limited vapor generation—particularly compared to other common materials like propane. The risks of fires or explosions at the terminal are presented graphically below in Figure 4.4-3. Additional information regarding the risks of fire and explosions during rail transport is provided in Appendix M, *Risk Assessment Technical Report*.

Figure 4.4-3. Environmental Health Risks from Potential Fires/Explosions at the Terminal (Onsite)—Proposed Action

Explosion Prevention

The facilities would meet national and state design codes for fire protection. These include tank separation distances, containment requirements, pressure relief valves, and fire suppression or protection systems. Numerous containment areas on the project site would control or limit where a release could spread; these also would reduce the chance of an ignited release effecting other

equipment or traveling off site via land or water. Shutoff valves would limit the quantity of material released. In addition, ignition and possible explosions would be limited through a range of physical and procedural precautions and facility personnel would be appropriately trained as required by existing regulations. Fire suppression and firefighting equipment would be located on site.

Measures that reduce the chance of ignition include but are not limited to the following:

- Install floating roofs to limit vapor generation in confined areas.
- Eliminate ignition sources.
- Use nonsparking tools and explosion-proof equipment.
- Separate tanks by appropriate distance.
- Ground all equipment.

Explosion Response

Should a release occur, the emergency response plan would address the roles, responsibilities, and actions to take, depending on how much was spilled, and where and whether ignition has already occurred. The National Fire Protection Agency has issued codes and standards affecting all types of facilities and storage including oil handling facilities. They also regularly analyze historic events to improve their codes and standards (National Fire Protection Agency 2014, 2015). Typical responses to an explosion are as follows.

- Implement emergency response plan.
- Protect public health and safety.
- Make notifications.
- Conduct hazard assessment and risk evaluation.
- Conduct continuous air monitoring, as appropriate.
- Confine the spill.
- For fire suppression, isolate or evacuate based on the product (e.g., the Emergency Response Guide No. 128 for petroleum crude oil recommends isolation and initial evacuation for 0.5 mile in all directions).
- Begin fire suppression operations.
- Clean up spill.
- Investigate immediate and contributing causes for the incident.
- Apply lessons learned to prevent future incidents.

4.4.3 What mitigation measures would reduce impacts related to terminal operations at the project site?

This section describes the applicant mitigation and other measures that would reduce onsite impacts on environmental health and safety from construction and routine operation of the proposed action. These mitigation measures are in addition to regulatory compliance and best practices discussed above.

4.4.3.1 Applicant Mitigation

The applicant will implement the following mitigation.

- To improve response times and communication in the event of an incident that could affect tribal resources, the applicant will include tribal contacts (names and/or phone numbers) in notification protocols in the oil spill contingency plan.
- To reduce the impacts from an oil spill, the applicant will establish and implement a procedure for blocking all drains on the dock prior to oil transfers and observing the area for discharges before removal.
- To improve oil recovery in the case of a spill during vessel loading at the dock, the applicant will retain a licensed engineer to perform an independent engineering analysis and feasibility study. The engineer will determine the number of days it is safe and effective to preboom oil transfers and will identify site-specific improvements to maximize successful prebooming. The applicant will ensure the study is submitted to the Washington State Department of Ecology (Ecology) for review. If approved, Ecology will amend the applicant's oil spill contingency to require prebooming and improvements consistent with the study.

  If improvements to allow for prebooming are determined to be unfeasible by Ecology and until changes are in place, the applicant will implement alternative measures, including but not limited to the following (in addition to those already required by regulation) to mitigate the absence of preventative boom in the water during transfers: stage dedicated response vessels, additional containment and cleanup equipment, and trained personnel at the terminal dock and/or at a nearby staging area during oil transfers. At a minimum, this alternative must include the following elements.

  - One oil spill response vessel with crew, skimmer, and at least 1,000 feet of boom at the dock.
  - On-water tank barge storage devices (not including bladders) prestaged at the dock with the skimmer to ensure a minimum of 450 barrels of recovery ready to be deployed.
- To reduce the risk of a spill, the applicant will require the facility person-in-charge (certified facility operator for oil transfers) to verify all connections are properly functioning for each oil transfer prior to the commencement of a transfer.
- To prepare for spills, the applicant will fully comply with Washington State contingency planning standards in place of any alternative measures previously approved in the oil spill contingency plan.

- To reduce the risks and impacts from an oil spill, prior to beginning the proposed operations the applicant will conduct a study to identify an appropriate level of financial responsibility for the potential costs for response and cleanup of oil spills, natural resource damages, and costs to state and affected counties and cities for their response actions. The study should address the factors in Revised Code of Washington 88.40.025, Evidence of Financial Responsibility for Onshore or Offshore Facilities, including a reasonable worst-case spill volume, the cost of cleaning up the spilled oil, the frequency of operations at the facility, prevention measures employed by the facility that could reduce impact through spill containment, immediate discovery and shutoff times, and the damages that could result from the spill (including restoration). The study should identify any constraints related to the commercial availability and affordability of financial responsibility. Based on the study, Ecology shall determine the appropriate level of financial responsibility and require the applicant to demonstrate their financial responsibility to the satisfaction of Ecology. Proof of financial responsibility will be included as documentation in the applicant's contingency plan.

- To improve preparedness for incidents, including oils spills, explosions, and fires, the applicant will ensure an emergency preparedness workshop is conducted prior to beginning project operations. The applicant will coordinate the workshop with Ecology. The workshop will be no more than 1 day in length and be held prior to beginning operations and annually thereafter. The initial workshop will focus on familiarizing local emergency responders, tribes, and communities with the contents of the Northwest Area Contingency Plan, the Grays Harbor and Chehalis Geographic Response Plans, other local response plans, the facility response plan, and the measures that are in place for a rapid and effective spill response.

4.4.3.2 Other Measures to Be Considered

Potential impacts associated with the proposed action could be further reduced by implementing the following measures.

- To reduce the risk of spills during transfer operations, the Port of Grays Harbor should verify that all personnel handling oil transfer equipment are trained in accordance with WAC 173-180 Part E (Training and Certification for Class 1 and Class 2 Facilities).

- To improve communications to the public in the case of an incident, the Port of Grays Harbor should develop a formal system for notifying potentially affected residents and businesses. The notification process should also address Spanish speakers and accommodate low-literacy readers.[2]

- To ensure adequate and appropriate resources are available to accommodate increased crude oil transfers at the project site, on trains and vessels, Ecology should review, and if necessary revise, contingency planning standards for Grays Harbor to require those resources.

- To improve response times and communication if an incident could affect tribal resources, the following measures should be considered.

[2] Chapter 7, *Economics, Social Policy and Cost-Benefit Analysis*, provides information on common languages in the study area.

- The Chehalis Tribe and the Quinault Indian Nation should identify members or staff to be contacted in the case of an incident with potential impacts on tribal resources.
- Ecology, PS&P, and the Port of Grays Harbor should notify tribal contacts.

4.4.4 Would the proposed action result in unavoidable and significant adverse environmental impacts related to terminal operations at the project site?

A large oil spill or explosion would likely cause unavoidable and significant adverse environmental impacts. As described above, the likelihood of a large spill or related explosion is low; however, the potential for significant consequences to the environment and human health in the case of a large spill or explosion is high. The specific impacts would vary based on the location, amount spilled, type of liquid, and weather conditions. Examples of these impacts are described in Section 4.7, *Impacts on Resources*. Regulatory requirements for prevention of, preparedness for, and response to a large spill or explosion and mitigation measures to reduce impacts are detailed above. However, no mitigation measures would completely eliminate the possibility of a large spill or explosion, nor would they completely eliminate the adverse consequences of a large spill or explosion.

4.4.5 Who would pay for the response and cleanup of an onsite spill?

Generally, the polluter pays for costs and damages associated with oil spills. The federal government has established high limits on that liability. Washington State places no limits on liability of polluters to third parties, allowing recovery of cleanup costs and natural resource damages beyond the federal limit (Table 4.4-1). To cover removal costs above the federal limits of liability, the U.S. Congress established a one billion dollar Oil Spill Liability Trust Fund to pay for expeditious oil removal and uncompensated damages.

Washington State law requires owners or operators of facilities to provide evidence of their financial ability to pay for damages that might occur during a reasonable worst-case spill of oil from the facility into the navigable waters of the state. The method to determine this is described in Section 4.4.3.1, *Applicant Mitigation*

Washington State law requires the party responsible for a spill of oil or hazardous substances to state waters to pay for the following costs.

- Their own costs to cleanup and remove oil spills.
- Damages to persons or property, including natural resources.
- Reimbursement to the state for necessary expenses for investigating, containing, removing, or treating oil related to an incident.

The responsible party may also be required to pay a penalty for violation of state law or rule.

Table 4.4-1. Limits of Liability for Spill Removal Costs

Reference	Applicability	Limits of Liability
33 U.S.C. 2704(a)(4)	Oil handling facilities	$350 million or less taking into account size, storage capacity, oil throughput, proximity to sensitive areas, type of oil handled, history of discharges, and other factors relevant to risks posed by the class or category of facility this limit may be reduced to less than $350 million but not less than $8 million.
RCW 88.40	Oil handling facilities	Washington State places no limits on liability.

U.S.C. = United States Code; RCW = Revised Code of Washington

4.5 Environmental Health Risks—Rail Transport

This section addresses the potential environmental health risks associated with offsite rail transport along the Puget Sound & Pacific Railroad (PS&P) rail line. This section first describes the environmental health risks that would exist under the no-action alternative to provide context for how risks would change with the addition of the proposed action. It then describes the potential risks related to oil spills, fires, or explosions associated with rail transport under the proposed action. This section then describes the existing planning, preparedness, and response framework in place that is intended to address risks at the terminal and identifies additional applicant mitigation measures. The section concludes with a discussion of potentially unavoidable and significant adverse impacts of the proposed action and an explanation of financial responsibility for emergency response and cleanup activities if an incident occurred during rail transport.

4.5.1 What are the existing risks?

Under the no-action alternative, the environmental health and safety risks during rail transport would include the potential for rail incidents that could harm people or the natural environment, particularly if the incidents resulted in spills of hazardous materials. These risks would be similar to existing conditions because a substantial increase in rail traffic on the PS&P rail line is not likely during the 20-year analysis period (2017 to 2037). Currently, three trains per day on average travel from Centralia to the Port of Grays Harbor carrying grain, autos, mixed freight, and a small number of cars carry hazardous materials. As discussed in Chapter 3, Section 3.15, *Rail Traffic*, train length could increase; however, additional train trips other than those related to the proposed action are not likely.

Under existing conditions, rail traffic consists primarily of grain, auto, and mixed freight trains. Only a few cars on these trains carry oil or hazardous materials. These materials are primarily related to the applicant's existing operations and include methanol, vegetable oil, sodium methylate, biodiesel, and glycerin.

It is not possible to predict the timing or magnitude of an incident; therefore, the likelihood of each of the following spill scenarios was considered to provide an understanding of risks under the no-action alternative.

- **Small rail transport spill scenario:** derailment resulting in a spill of up 1,000 gallons (24 barrels).
- **Medium rail transport spill scenario:** derailment resulting in a spill of up to 30,000 gallons (714 barrels or the contents of one full tank car).
- **Large rail transport spill scenario:** derailment resulting in a spill of up to 90,000 gallons (2,140 barrels or the contents of three full tank cars).
- **Large rail transport spill scenario:** derailment resulting in a spill of up 900,000 gallons (21,400 barrels or the contents of 30 full tank cars).

The relative risks of these spill scenarios are shown graphically in Figure 4.5-1 and summarized below.

Figure 4.5-1. Environmental Health Risks from Potential Spills during Rail Transport—No-Action Alternative

The spill scenarios have the following likelihood of occurring under the no-action alternative.

- The **small rail transport spill scenario** could occur once in 170 years.
- The **medium rail transport spill scenario** could occur once in 97 years.
- The **large rail transport spill scenario** could occur once in 6,300 years.

The impacts of chemical releases into the environment are addressed in Chapter 3, Section 3.14, *Hazardous Materials*. For additional details about the analysis of risks under the no-action alternative, see Appendix M, *Risk Assessment Technical Report*.

4.5.2 What are the potential risks of the proposed action?

Under the proposed action, the environmental health and safety risks along the PS&P rail line would include the possibility of rail incidents that could harm people or the natural environment, particularly if larger spills of oil or the other proposed bulk liquids occurred. These risks would be greater than under the no-action alternative because more trains would be operating. Additionally, trains traveling to the project site would consist of unit trains (longer trains carrying a single commodity) of oil. Increasing the number of cars carrying high-hazard commodities increases the chance of environmental harm in the event of rail incident.

This section describes factors influencing the potential increase in risks along the PS&P rail line, including the change in the likelihood of a spill occurring under the proposed action. This section also identifies mitigating factors currently in place to reduce the impacts of a spill and describes the potential extent of a spill and the response actions that would occur. This section also describes the

risks of fires or explosions related to the proposed action and the response actions that would occur in the event of a fire or explosion along the PS&P rail line.

On a national level, the number of rail cars carrying crude oil has increased nearly 44 times in the last 6 years, from 9,500 carloads in 2008 to 415,000 carloads in 2013. By the end of 2014, 650,000 carloads carrying 19.5 billion gallons (464 barrels) of crude oil are expected to travel on national rail lines. Following the national trend, Washington State has experienced dramatic changes in the amount and types of oil transported by rail. The new oil types include heavy crude oils such as bitumen from Canada and Bakken crude from North Dakota.

Rail incidents involving crude oil or other harmful materials typically result in small releases. For example the average petroleum release size of 738 gallons (17.6 barrels), from 2001 to 2012, is based on nationwide spills as reported in the *Rail Transportation Impact Analysis for Imperium* (WorleyParsons 2014:146) using Association of American Railroads data. However, recent incidents in Lac-Mégantic, Québec; Casselton, North Dakota; Aliceville, Alabama; and Lynchburg, Virginia have been more significant.

According to the Rail Transportation and Engineering Center at the University of Illinois (Lui et al. 2012), for rail operations under 10 miles per hour (mph), the main causes of derailments are track and human factors such as improper train handling, braking operations, and improper use of switches. For rail operations above 25 mph, equipment issues were the main cause for derailments. For speeds between 11 and 25 mph, track, miscellaneous, equipment, and human factors all contributed. The PS&P rail line maximum speed is 25 mph and slower for certain areas as described below. A separate study (Anderson and Barkan 2004) identified speed as the critical factor in predicting the severity of a derailment. The length of the train is also an important factor. In general, the greater the mass and speed, the greater the force and potential impacts.

A May 2014 emergency order issued by the U.S. Department of Transportation required railroads to notify the state of the frequency and oil volumes for trains carrying 1 million gallons (23,800 barrels) or more of Bakken crude. The Washington State Department of Ecology (Ecology) report on marine and rail oil transportation identified concerns about oil transportation in the state (Washington State Department of Ecology 2015). The U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration's (PHMSA) final rule (80 *Federal Register* [FR] 26643) sets requirements for routing assessments and notifications (Section 4.2.1.2, *Rail*).

The PS&P rail line in the study area covers 59 miles of Track Class 2 lines. Per the Federal Railroad Administration (2007), the track must meet all the requirements for its designated track class. These standards, discussed in Chapter 3, Section 3.15, *Rail Traffic,* apply to the following elements.

- Track surface (the evenness or uniformity of track).
- Track alignment (the variation in curvature of each rail of the track).
- Required number of cross ties.
- Alignment of the rail ends at joints.
- Frequencies of inspections for different components.

Nationwide, historic incident rates are higher on Class 2 track than they are on Class 3 track, primarily because of the different design and maintenance standards for these tracks. All traffic in the study area moves at 25 mile per hour or less, as per Track Class 2 standards (Chapter 3, Section 3.15, *Rail Traffic*). Some bridges have lower speed limits: 10 mph over Devonshire Bridge (Wynoochee River) and 5 miles per hour over the moveable bridges over the Wishkah and Hoquiam Rivers.

Operation of the proposed action at maximum throughput would add approximately two unit train trips per day on average (730 per year maximum) along the PS&P rail line to the existing average of three train trips per day (1,235 per year) under the no-action alternative (Section 3.15, *Rail Traffic*). This would increase the potential for incidental releases of oil and hazardous substances, pollutants, and contaminants during offsite transport.

4.5.2.1 Oil Spills

Oil Spill Risk

There were four recent derailments on the PS&P rail line, all in April and May 2014. These derailments did not involve oil spills.

- On April 29, two cars derailed at 5 mph at South Washington Street in Aberdeen due to wide gauge (track separation).
- On May 9, seven cars derailed at 6 mph at Heron Street in Aberdeen due to wide gauge.
- On May 15, 10 cars derailed at 10 mph near Montesano due to thermal track misalignment.
- On May 21, 11 cars derailed at 5 mph at Blakeslee Junction due to a combination of train make-up and track geometry design.

The risk of an oil spill from train operations typically relates to the risk of derailment. A derailment does not mean a spill will happen; a train can derail with no spill resulting. A leak could occur during transport of the rail car but the spill quantity at a single point along the rail would likely be small because the leak could occur over several miles of track.

Because of the increased number of rail trips to and from the project site, the proposed action would result in the potential for more frequent spills of bulk liquids relative to the no-action alternative, although the orders of magnitude are very similar. The likelihood of very large releases would remain low. As noted previously, it is not possible to predict the timing or magnitude of an incident; therefore, the following spill scenarios were considered to provide an understanding of risks under the proposed action.

- **Small rail transport spill scenario:** derailment resulting in a spill of up 1,000 gallons (24 barrels).
- **Medium rail transport spill scenario:** derailment resulting in a spill of up to 30,000 gallons (714 barrels or the contents of one full tank car).
- **Large rail transport spill scenario:** derailment resulting in a spill of up to 90,000 gallons (2,140 barrels or the contents of three full tank cars).

- **Large rail transport spill scenario:** derailment resulting in a spill of up 150,000 gallons (3,570 barrels or the contents of five full tank cars).
- **Large rail transport spill scenario:** derailment resulting in a spill of up 900,000 gallons (21,400 barrels or the contents of 30 full tank cars).

The relative risks of these spill scenarios are shown graphically in Figure 4.5-2 and summarized below.

Figure 4.5-2. Environmental Health Risks from Potential Spills during Rail Transport—Proposed Action

- The **small rail transport spill scenario** could occur once in 63 years with current rail cars; with rail car improvements (80 FR 26643), this would extend to once in 66 years.
- The **medium rail transport spill scenario** could occur once in 23 years with current rail cars; with rail car improvements, this would extend to once in 27 years.
- The **large (three-car) rail transport spill scenario** could occur once in 160 years with current rail cars; with rail car improvements, this would extend to once in 270 years.
- The **large (five-car) rail transport spill scenario** could occur once in 3,000 years with current rail cars; with rail car improvements, this would extend to once in 7,000 years.
- The **large (30-car) rail transport spill scenario** could occur once in 6,300 years with current rail cars; with rail car improvements, this would extend to once in 46,000 years.

Along the PS&P rail line in the study area, a spill could affect a sensitive area or habitat of concern. Table 4.5-1 lists sensitive habitat areas and identifies the approximate length of exposure and its relative portion of the total route along the PS&P rail line. This percentage can be applied to the estimated chances of a release to determine the possibility that a specific release might occur in a particular area. This does not consider the extent of the spread, just the chance that a spill occurs in the area. For example, according to the assessment explained in Appendix M, *Risk Assessment Technical Report*, the chance of a spill equal to one rail car (30,000 gallons [714 barrels]) occurring anywhere along the PS&P rail line is once in23 years. The likelihood of this occurring near the marbled murrelet critical habitat would be predicted based on the percentage of marbled murrelet critical habitat along the route. Because this habitat occupies approximately 5% of the route, the likelihood of a spill would be 5% of the total chance, or once in 310 years.

Table 4.5-1. Sensitive Habitats along the PS&P Rail Line

Sensitive Habitat	Approximate Length of Exposure	Percent of Total Route
Three marbled murrelet critical habitat areas	3 miles	5%
Three crossings of bull trout streams designated as critical habitat areas	2 miles (approximate exposure considering track leading to and from crossings)	3%
Chehalis River Surge Plain Natural Area	6 miles	10%
Stretch of Chehalis River close to the rail line, designated as critical habitat for bull trout	10 miles	17%
Critical habitat for the Oregon spotted frog along Black River	10 miles	17%
Locations of two sensitive plant species (multiple locations between US Route 12 and the Black River crossing)	10 miles	17%
Source: Appendix M, *Risk Assessment Technical Report*		

Due to increased rail traffic, the proposed action would increase the potential for more frequent releases of bulk liquids relative to the no-action alternative. The risk of very large releases, however, would remain relatively low.

To provide additional information about the risks of a spill and to inform prevention, preparedness, and response planning relevant to the proposed action, oil spill modeling examined the movement of oil in the Chehalis River. The model uses two release points: one near Porter Creek Road near Oakville and the other at the Wynochee Bridge crossing. As presented in Appendix N, *Oil Spill Modeling*, the movement of spilled oil in the Chehalis River can vary dramatically, depending on weather conditions and hydrologic flow conditions. Depending on the size and location of the release, oil could move into the estuary in as few as 7.6 hours (100-year flood conditions) or in 4.5 days (low-flow conditions) if no response efforts contain the oil. The potential impacts of exposure to spills are addressed in Section 4.7, *Impacts on Resources*.

Oil Spill Prevention

As discussed in Section 4.2, *Applicable Regulations*, railroad operators that transport oil and hazardous materials are required to meet federal and state standards for locomotives and rail cars. They must also develop contingency and response plans to prevent spills from reaching the environment. Railroads must submit an incident report for derailments to the Federal Railroad

Administration. Lessons learned from these reports can be incorporated into future contingency planning.

As described in Section 4.2.1.2, *Rail*, PHMSA has issued a final rule that defines and regulates high-hazard flammable trains (49 Code of Federal Regulations [CFR] 171–180). The proposed requirements would improve the safety of crude oil and ethanol shipments by rail (80 FR 26643). The following steps outlined in the rule are intended to improve the safety of high-hazard flammable trains.

- Improve classification and characterization of crude oil to ensure the type of rail car used is appropriate.
- Provide appropriate railroad contact information to state, local, and tribal officials who contact a railroad to seek information about routing hazardous materials through their jurisdictions. This helps secure the exchange of sensitive information.
- Reduce operating speeds to no more than 40 mph. The PS&P rail line is already limited to 25 mph as Class II track and there are slower speed limits in areas.
- Require all high-hazard flammable trains to be equipped with alternative brake signal propagation systems of either electronic controlled pneumatic brakes, a two-way end of train device, or distributed power.
- Require new and existing tank cars to meet specific design requirements or performance criteria (e.g., thermal, top fittings, and bottom outlet protection; tank head and shell puncture resistance).

Oil Spill Response

Railroad

Typical actions for responding to a spill from a crude oil train derailment (if there is no fire) are as follows. Similar actions would be taken for all products proposed to be transported.

- Implement emergency response plan required under federal law. This includes notifications and initial actions for incidents.
- Protect public health and safety.
- Contact railroad emergency contact.
- Contact shipper (owner of the oil) using the shipping papers, railroad emergency contact, or CHEMTREC.
- Conduct hazard assessment and risk evaluation.
- Conduct continuous air monitoring, as appropriate.
- Confine the spill.
- Apply foam for vapor suppression, if available.

- Isolate or evacuate based on recommendations in the product-based emergency response guide (for example, Guide No. 128 for petroleum crude oil recommends initial downwind evacuation for at least 1,000 feet).

For first responders from the local jurisdictions or the railroad emergency response team, the posture for an oil or hazardous material spill on the rail is the same—defensive and protective. The local responders will do what is necessary to evaluate and report on the situation, keep themselves and the public safe, and monitor response and cleanup operations for compliance with local ordinances and permits.

Depending on the severity of the incident, when considering impacts on public health and the environment, the U.S. Environmental Protection Agency, U.S. Coast Guard, and Ecology may take a more aggressive role in the initial response operations to ensure that the responsible party is taking appropriate and timely action to mitigate damages to the environment.

The onus is on the responsible party to respond with the appropriate resources to contain the situation and clean up the spill. The federal basic oil spill response plan (49 CFR 130) currently applicable to rail operators with oil shipments of a capacity of 3,500 to 42,000 gallons per car does not require equipment to be contracted and available for an immediate response to an oil spill incident. In August 2014, PHMSA issued an advanced notice of proposed rulemaking seeking comment on potential revisions to its regulation to require high-hazard flammable trains to prepare comprehensive oil spill response plans (79 FR 45080). The comprehensive plans would require better coordination, identification of personnel, equipment, and training for responses to spills, and submission of the plan to the Federal Railroad Administration.

The Washington State passed ESHB 1449 in 2015, authorizing Ecology to adopt rules to require PS&P to prepare an oil spill contingency plan. The plan would, among other things, demonstrate that PS&P has the capacity to remove oil and minimize any damage to the environment resulting from a worst-case spill. Prior to adoption of rules, the federal oil spill response plans will be used to meet the state requirement.

Geographic Response

As mentioned previously, the Grays Harbor and the Chehalis River Geographic Response Plans (GRP) contain specific response strategies in the event of an oil spill (from any source) into or threatening waters and related environmental resources along the PS&P rail line. For example, the Grays Harbor GRP contains 16 response strategies relevant to an oil spill that affects the Chehalis River (this number does not include response strategies related to tributaries or wetlands that connect to the river). These strategies encompass boom placement to close off movement of spilled oil into environmentally sensitive sites (such as the Elliot Slough in Aberdeen), to deflect oil moving on the river into a containment area for collection (with vacuum trucks and sorbent materials), or to divert oil away from areas that are sensitive and/or hard to clean. Culvert blocks or underflow dams are also response strategies presented within the GRPs to aid in shoreline protection and oil collection. The GRPs also contain supplemental information related to the response strategies that support their implementation. For example, the Chehalis River GRP includes a table with appropriate boom deflection angles for a range of water speeds and another table with stream flow data (averaged over several years) recorded at various points in the Chehalis River and its tributaries.

The response strategies are prioritized in the GRPs to reflect the sensitivity of threatened environmental resources or potential public health concerns (as in the case of spill proximity to populated areas or water intakes). In some cases, economic considerations may dictate response priorities (for example preventing oil from affecting a dock area near a waterside restaurant or a marina). These priorities are discussed prior to a spill and reflected accordingly in the GRPs to prevent a delay in the allocation of potentially scarce response assets during an active spill response.

Each GRP identifies potential spill origin points. Table 4.5-2 provides the identification labels for the points that could originate from a project-related rail incident and affect sensitive sites due to proximity of the rail line to the Chehalis River or a tributary (there is no attribution in the GRPs for the cause of the spill at the spill origin points).

Table 4.5-2. Geographic Response Planning Spill Origin Points along the PS&P Rail Line

Spill Origin Point Designation	Geographic Designation
Grays Harbor Geographic Response Plan	
GH-A	Chehalis River Upstream of Cosmopolis
GH-B	Aberdeen/Hoquiam/Port of Grays Harbor
Chehalis River Geographic Response Plan *(draft)*	
CHER-O	Central Park
CHER-N	Wynoochee River
CHER-M	Wenzel Slough
CHER-K	Porter
CHER-J	Oakville
CHER-I	Black River

Each spill origin point has a multitude of associated response strategies within the GRPs due to the inevitable likelihood that spilled oil will spread on and flow with water until it is contained and removed.

In addition to the site-specific information in the GRPs, there is relevant information in other sections of the larger Northwest Area Contingency Plan that supplements the site-specific strategies. For example, Chapter 3000 – Operations, contains a section titled *Operational Safety Issues Associated with Bakken Crude Oil* and another section titled *Fast Water Oil Spill Response*, which would inform local responders in the event of a rail incident. Section 9302 of the Northwest Area Contingency Plan is entirely dedicated to responder decision tools for oil spill response in fast water currents.

4.5.2.2 Fires or Explosions

Fire or Explosion Risk

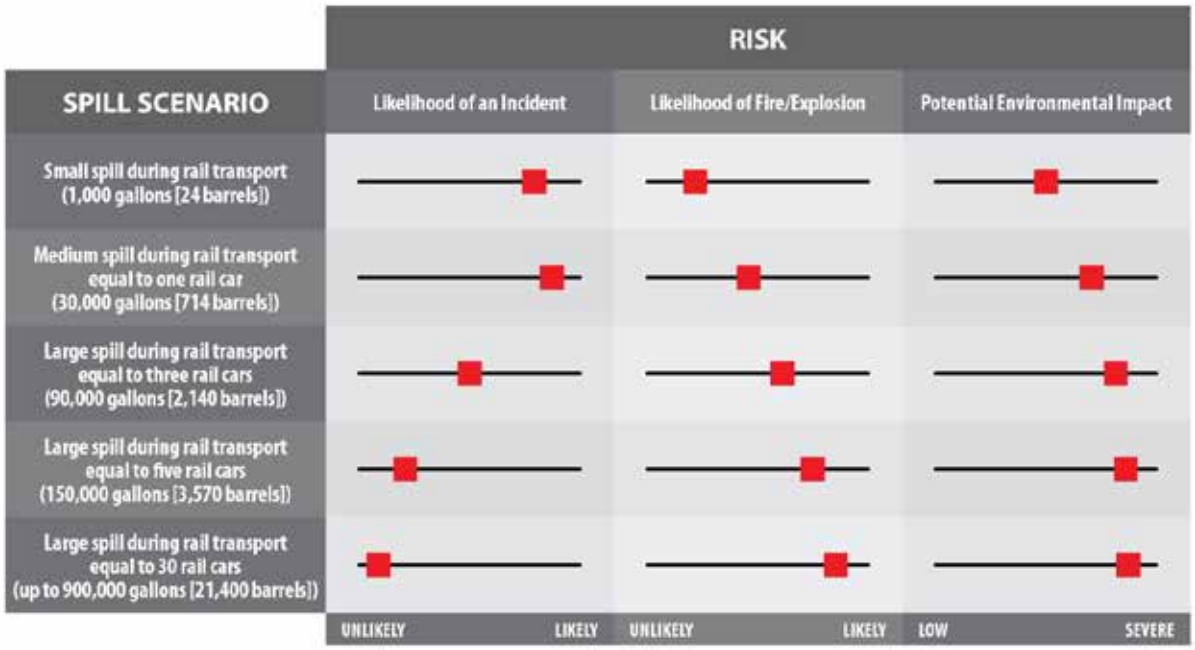
A spill could cause a fire or explosion if there is an ignition source and combustible gases are present in a quantity that could ignite. The incident could cause sparking, which could ignite the spill. Explosions are most likely when a spill is ignited and the resulting fire impinges on another tank or rail car. As the material in these adjacent tanks or rail cars heat up, the pressure builds and may eventually burst the container. The extent of the damage depends on the exact configuration of the

release and fire compared to the location of the other tanks or rail cars, any fire suppression capabilities, and the timing and nature of response actions. It also depends on the material: Bakken crude oil is more flammable than other heavier crude oils. The flammability of diluted bitumen varies based on the diluent (diluting agent) used. Other proposed bulk liquids, such as jet fuel, gasoline, kerosene, and naphtha are also highly flammable.

Although fires or explosions can result from spills resulting from events like collisions and derailments, long-term historical data show that most spills do not result in fires or explosions. A fire or explosion would be less likely to occur than a spill. While there have been multiple recent derailments of trains on main lines that resulted in fires or explosions, the chance of an extreme derailment is very limited in the study area because of the slow speeds on the PS&P rail line, which are slower than typical mainline speeds. In general, large derailments from high-speed trains lead to releases from multiple rail cars. The energy involved in high-speed derailments and the resulting scatter of rail cars yield the greatest chance of a fire that affects other rail cars and possibly result in an explosion.

The risks of fires or explosions at the terminal are presented in Figure 4.5-3. Additional information regarding the risks of fire and explosions during rail transport is provided in Appendix M, *Risk Assessment Technical Report*.

Figure 4.5-3. Environmental Health Risks from Potential Fires or Explosions during Rail Transport—Proposed Action



Explosion Prevention

Rail operations are required to meet national and state regulations for safe operation and maintenance, which are intended to prevent fires and explosions related to rail transport.

Explosion Response

PHMSA provides guidance for a fire or explosion from a train carrying crude oil (Pipeline and Hazardous Materials Safety Administration 2014), which states that,

> "in the event of an incident that may involve the release of thousands of gallons of product and ignition of tank cars of crude oil in a unit train, most emergency response organizations will not have the available resources, capabilities, or trained personnel to safely and effectively extinguish a fire or contain a spill of this magnitude (e.g., sufficient firefighting foam concentrate, appliances, equipment, water supplies). Response to unit train derailments of crude oil will require specialized outside resources that may not arrive at the scene for hours; therefore it is critical that responders coordinate their activities with the involved railroad and initiate requests for specialized resources as soon as possible."

As with oil spills, first responders from the local jurisdictions or the railroad emergency response team would provide an initial investigation. The first responders are expected to enact defensive operations until appropriate and adequate resources are on scene. The on-scene coordinator would contact the company responsible for the product for technical support related to an emergency with the oil or chemical (49 CFR 172.604). Rail carriers provide emergency response resources. These may include air monitoring and environment management capabilities, technical specialists, and contractors to assist in managing the consequences of a crude oil train derailment (49 CFR 130.31). Final rules updating the requirements are pending.

Capabilities at the local level differ between fire departments. The local fire departments along the PS&P rail line do not have technical hazardous material teams. Air monitoring capabilities vary based on the equipment and personnel trained. Supporting resources may be available from surrounding jurisdictions. Under Revised Code of Washington (RCW) 43.43.961, the Fire Service Resource Mobilization Plan provides personnel, equipment, and other logistical resources from around the state when a fire or other emergency, like a hazardous material release, exceeds the firefighting and hazardous material capacity of local jurisdictions (Washington State Patrol Office of the State Fire Marshal 2014:5). State agencies that share responsibility as primary agencies for a hazardous material response are Ecology and the Washington State Patrol (Washington State Emergency Management Division 2011). If a fire or hazardous material response incident escalates beyond the limits of state resources, additional federal assets can be requested for an incident.

Typical emergency actions for responding to a crude oil train derailment resulting in an explosion or fire are as described in Section 4.5.2.1, *Oil Spills, Oil Spill Response.* Similar actions would be taken for all products proposed to be transported.

4.5.3 What mitigation measures would reduce impacts related to rail transport?

This section describes the voluntary measures and design features, applicant mitigation, and other measures that would reduce impacts on environmental health and safety impacts from rail

transport related to the proposed action. These mitigation measures are in addition to regulatory compliance and best practices discussed above.

4.5.3.1 Voluntary Measures and Design Features

- To reduce potential risk from tank car punctures and spills identified with use of DOT-111 tank cars for transport of Bakken crude oil, the applicant will not accept crude oil by rail unless the following actions occur.
  - The rail cars meet or exceed the new U.S. Department of Transportation specification 117 design or performance criteria.
  - Existing tank cars are retrofitted in accordance with the U.S. Department of Transportation-prescribed retrofit design or performance standard (80 FR 26643).

4.5.3.2 Applicant Mitigation

The applicant will implement the following mitigation.

- To improve preparedness for incidents, including oils spills, explosions, and fires, the applicant will ensure an emergency preparedness workshop is conducted prior to beginning project operations. The applicant will coordinate the workshop with Ecology. The workshop will be no more than 1 day in length and be held prior to beginning operations and annually thereafter. The initial workshop will focus on familiarizing local emergency responders, tribes, and communities with the contents of the Northwest Area Contingency Plan, the Grays Harbor and Chehalis Geographic Response Plans, other local response plans, the facility response plan, and the measures that are in place for a rapid and effective spill response.
- To improve the safe transport of crude oils with different volatilities and sinking tendencies, the applicant will not accept crude oil by rail unless the following actions have occurred.
  - The applicant has received verification that a sample of the oil has been tested and properly classified and characterized.
  - Where classification and characteristics of the oil are available in advance, the applicant has fully described this information and the implications for emergency response in its oil spill contingency plan.
- To reduce risks of a spill due to a rail incident, the applicant will not accept crude oil unit trains by rail unless the train has in place a functioning two-way end-of-train device or distributed power for operations on the PS&P rail line to the local yard.
- Due to sensitivity of the local environment, tribal resource concerns, and the potential presence of special-status species, to improve coordination and response capabilities in the event of a rail accident, the applicant will not accept crude oil by rail unless PS&P prepares, submits to Ecology for approval, and implements a contingency plan meeting the requirements identified below. This requirement will remain in place until state contingency plan requirements for railroads are implemented by Ecology pursuant to ESHB 1449, Section 5, and/or amendments to the federal oil spill response plan rule (49 Code of Federal Regulations 130) is adopted.

  - Disclose full details of the method of response to spills to various sizes.
  - Define a worst-case spill planning volume.
  - Identify response notification and coordination procedures.
  - Identify personnel assigned to implement the plan.
  - Reference applicable Washington State geographic response plans.
  - Describe a training and exercise program for personnel and equipment.
  - Identify prepositioned spill containment and cleanup equipment and trained personnel.
  - Identify arrangement for enlisting qualified and trained cleanup personnel to implement the plan.
  - Describe how plan relates to other relevant contingency plans, such as facility plans, other rail plans, including federal oil spill response plans, and regional plans.

- To improve first response effectiveness and safety, the applicant will consult with the Olympic Region Clean Air Agency and U.S. Environmental Protection Agency to identify air monitoring equipment needs for public health and safety in the case of a spill or explosion. The applicant will ensure equipment identified that is necessary for determining air quality conditions but not available through local agencies or fire departments will be made available to local fire departments.
- To increase the timeliness of responses to spills and incidents involving trains and to maximize coordination of responses along the PS&P rail line, the applicant will not accept crude oil by rail unless the following measures are completed.
  - PS&P participates with the local fire districts in a public safety drill at least once every 2 years.
  - PS&P tests one geographic response plan strategy annually and invites Ecology to participate.
  - PS&P participates in testing the applicant's oil spill contingency plan with a rail scenario at least once every 3 years, including participating in at least one drill every 3 years. This drill will be designed with Ecology and scheduled on the regional drill calendar.
- To improve response capability for spills that may occur on the Chehalis River, the applicant will coordinate with Ecology to advertise and extend registration of Vessels of Opportunity to the Chehalis River and to tribal boat owners prior to beginning operations. Applicants for the Vessel of Opportunity Program should be directed to www.oilspills101.wa.gov for information and registration.
- To improve response capability for trains transporting product to the project site, the applicant will not accept crude oil until a foam truck has been provided to the Elma Fire Department to provide fire-fighting capability along the PS&P rail line. The foam truck must be available and

operational prior to beginning operations. The applicant will consult with Ecology and the local fire department to determine the capacity of the foam truck.

- To improve response times to reduce the initial impacts of an oil spill, the applicant will ensure that two trailers containing the spill response equipment listed below are available prior to beginning crude oil operations for use by initial local and emergency responders along the PS&P rail line. This equipment will be offered to fire departments along the PS&P rail line and the Chehalis Indian Tribe. The trailer and equipment will be maintained by the applicant and inspected annually. The equipment will only be provided to fire departments and Chehalis Tribe if they agree to store the equipment in a secure location and ensure the equipment used by appropriately trained personnel. The applicant will work with Ecology and local emergency officials to update the Western Region Response List website (www.wrrl.us), any applicable spills response plans to address the emergency equipment caches and to document notification protocols, necessary training, use of Personal Protective Equipment, and equipment deployment procedures.
- Mobile trailers of a specific size to hold the below equipment:
  - 3000 feet of river boom in four 500-foot sections and five 200-foot sections
  - 5000 feet of sausage sorbent boom
  - 30 kits - anchoring systems (anchors, lines, floats)
  - 20 kits - shoreside anchoring systems
  - 1 towing bridle
  - 4 heaving lines
  - 1 machete (or other vegetation cutting tool)
  - 1 pair of bolt cutters
  - 50 sandbags
  - 1 roll plastic sheeting
  - 4 each plywood sheets (4 feet by 8 feet)
  - 500 feet 3/8-inch poly line
  - PPE: coveralls or Tyvek ® disposable suits, gloves, outer (chemical-resistant and disposable) boots, safety glasses or chemical splash goggles, hard hats - sufficient for 5 people
- To reduce risks related to an oil spill, the applicant will not accept crude oil by rail until PS&P meets with local emergency management officials to identify training needs for local responders who will respond to an emergency on the PS&P rail line. This effort will include development and execution of a training program to these responders to increase level of awareness and understanding of the hazards associated with an oil train incident. The training will include identification of notification protocols, use of Personal Protective Equipment, and equipment

deployment procedures. This training will be completed before the applicant begins receiving oil trains and will be offered at least annually.

- To improve response capability on the Confederated Tribes of the Chehalis Reservation lands in the case of an oil spill, the applicant will ensure that an annual 1-day hazard awareness oil spill training for identified Chehalis tribal members is provided, including conducting and inviting tribal members to participate in drills.
- To improve response capability in the Grays Harbor area in the case of an oil spill, the applicant will ensure an annual one-day hazard awareness oil spill training is provided for identified Quinault Indian Nation tribal members, including conducting and inviting tribal members to participate in drills.
- To increase the timeliness and maximize the coordination of responses to spills and incidents involving crude oil trains along the PS&P rail line, the applicant will ensure the Grays Harbor Local Emergency Planning Committee's emergency response plan is updated to address the applicant's operations. This information must be included prior to beginning operations.

4.5.3.3 Other Measures to Be Considered

Potential impacts associated with the proposed action resulting from increased likelihood of a rail incidents occurring could be further reduced by implementing the following measures.

- To improve coordinated responses, Ecology should urge the legislature to amend current laws, including RCW 90.56, RCW 88.40, and RCW 88.46, to require contingency plans, advance notice of transfer and certificates of financial responsibility from railroads transporting oil, including PS&P.
- To increase the timeliness of responses to spills and incidents, Ecology should seek funding for a grant program to supply firefighting equipment and oil spill response equipment to local responders along the rail lines.
- To increase the timeliness of responses to spills and incidents involving trains and maximize coordination of response along the PS&P rail line, PS&P should attend meetings and discuss incidents and near misses with the Grays Harbor Local Emergency Planning Committee at least once annually. PS&P should discuss with the Washington Utilities and Transportation Commission the feasibility of creating a railroad safety committee based on the model of the Grays Harbor Safety Committee.
- To improve response capability on the Chehalis Tribe Reservation in the case of an oil spill, the Chehalis Tribe should identify members who could respond to oil spills and provide this information to PS&P and the Grays Harbor Local Emergency Planning Committee.
- To improve response capability in Grays Harbor in the case of an oil spill, the Quinault Indian Nation should identify members who could respond to oil spills and provide this information to PS&P and the Grays Harbor Local Emergency Planning Committee.
- To improve local response capability in the case of an oil spill, the Grays Harbor, Thurston, and Lewis Local Emergency Planning Committee and Fire Departments along the PS&P rail line should support the attendance of local emergency response personnel at the Security and

Emergency Response Training Center in Pueblo, Colorado, to enhance their skills in response to releases from train incidents.

- To reduce the risk of an incident on the PS&P rail line, PS&P should work with local officials to collaborate and initiate a comprehensive community awareness campaign to educate and inform the public of the dangers of trespassing into the railway and trying to beat a train. This campaign will include communication of new train frequency, publishing ads in local newspapers, and continuing to support the existing Operation Lifesaver program with visits to schools, community centers, civic clubs, and town hall meetings.

4.5.4 Would the proposed action result in unavoidable and significant adverse environmental impacts related to rail transport?

A large oil spill or explosion would likely cause unavoidable and significant adverse environmental impacts. As described above, the likelihood of a large spill or related explosion is low; however, the potential for significant consequences to the environment and human health in the case of a large spill or explosion is high. The specific impacts would vary based on the location, amount spilled, type of liquid, river flow, time of year, and weather conditions. Examples of these impacts are described in Section 4.7, *Impacts on Resources*. Regulatory requirements for the prevention of, preparedness for, and response to a large spill or explosion and mitigation measures to reduce impacts are detailed above. However, no mitigation measures would completely eliminate the possibility of a large spill or explosion, nor would they completely eliminate the adverse consequences of a large spill or explosion.

4.5.5 Who would pay for the response and cleanup of a rail transport spill?

The liability for rail transport spills is the same as described for onsite spills (Section 4.4.5) when there is the potential for waters of the United States to be affected. The polluter pays for costs and damages associated with oil spills. Response and cleanup of spills from rail cars that threaten the navigable waters or adjoining shorelines are the responsibility of the owner or operator (also referred to as the *shipper*) of the rail cars carrying the crude oil (RCW 88.40, Transport of Petroleum Products—Financial Responsibility). The federal government has established high limits on that liability. Washington State places no limits on liability of polluters to third parties, allowing recovery of cleanup costs and natural resource damages beyond the federal limit. To cover removal costs above the federal limits of liability, the U.S. Congress established a 1-billion-dollar Oil Spill Liability Trust Fund to pay for expeditious oil removal and uncompensated damages.

If the spill from a train car does not reach or threaten navigable waters, the federal Resource Conservation and Recovery Act (42 United States Code [U.S.C.] 6901) as well as the Federal Comprehensive Environmental Response, Compensation, and Liability Act (42 U.S.C. 9607), and the Natural Resource Damage Act (43 CFR Part 11) provide mechanisms for the State to obtain compensation from the responsible party for cleanup and environmental restoration, and liability provisions for criminal and civil penalties.

4.6 Environmental Health Risks—Vessel Transport

This section addresses the potential environmental health risks associated with offsite vessel transport in Grays Harbor. This section first describes the environmental health risks that would exist under the no-action alternative to provide context for how risks would change with the addition of the proposed action. It then describes the potential risks related to oil spills, fires, or explosions associated with vessel transport under the proposed action. This section then describes the existing planning, preparedness, and response framework in place that is intended to address risks related to vessel transport and identifies additional applicant mitigation measures. The section concludes with a discussion of unavoidable and significant adverse impacts of the proposed action and an explanation of financial responsibility for emergency response and cleanup activities if an incident occurred during vessel transport.

4.6.1 What are the existing risks?

Under the no-action alternative, the environmental health and safety risks during vessel transport would include the potential for vessel incidents that could harm people or the natural environment, particularly if the incidents resulted in spills of hazardous materials. These risks would be similar to existing conditions at least initially but could increase over time because of projected increases in vessel traffic over the 20-year analysis period (2017 to 2037) unrelated to the proposed action (Chapter 3, Section 3.17, *Vessel Traffic*).

Under existing conditions, large commercial vessel traffic in Grays Harbor consists primarily of dry-cargo vessels that carry grain and wood products and vessels carrying cars, referred to collectively in this document as *cargo vessels*. In addition, there are tank vessels[1] carrying bulk liquids, including methanol, nontoxic vegetable oils, and biodiesel related to existing operations.

As it is not possible to predict the timing or magnitude of an incident, the following large spill scenarios were considered to provide an understanding of risks under the no-action alternative.

- **Vessel collision spill scenario:** vessel collision with another vessel resulting in a spill of up to 105,000 gallons (2,500 barrels).
- **Vessel grounding spill scenario:** vessel grounding resulting in a spill of up to one compartment of 1.2 million gallons (29,000 barrels).
- **Vessel allision spill scenario:** vessel allision with a fixed structure (e.g., jetty or pier) at the harbor entrance resulting in a spill of up to 15.1 million gallons (360,000 barrels).

The relative risks of these scenarios are shown graphically in Figure 4.6-1 and the likelihoods are summarized below. Spills related to vessel operations while at Terminal 1 are discussed in Section 4.4, *Environmental Health Risks—Terminal (Onsite).*

[1] *Tank vessels* include *tankers* (self-propelled ships) and *tank barges* (barges propelled by tugs). While these are cargo vessels as well, they are referred to separately for the purposes of this document. Tank vessels and cargo vessels are referred to collectively in this document as *large commercial vessels*.

Figure 4.6-1. Environmental Health Risks from Potential Spills during Vessel Transport—No-Action Alternative

The scenarios have the following likelihood of occurring under the no-action alternative.

- The **vessel collision spill scenario** could occur once in 2,100 years.
- The **vessel grounding spill scenario** could occur once in 6,000 years.
- The **vessel grounding spill scenario** could occur once in 7,900 years.

The impacts of chemical releases into the environment are addressed in Chapter 3, Section 3.14, *Hazardous Materials*. For additional details about the analysis of risks under the no-action alternative, see Appendix M, *Risk Assessment Technical Report*.

4.6.2 What are the potential risks?

Under the proposed action, the environmental health and safety risks in the harbor would include the possibility of vessel incidents that could harm people or the natural environment, particularly if larger spills of oil or other proposed bulk liquids occurred. These risks would be greater with implementation of the proposed action compared to the no-action alternative. The risks would be greater because there would be more vessels operating in the harbor, which would generally increase the potential for an incident. There would also be new environmental health risks related to the potential exposure of people and the natural environment to crude oil and the other proposed bulk liquids.

This section describes factors influencing the potential increase in risks in the harbor. It identifies the change in the likelihood of a spill occurring under the proposed action, identifies mitigating factors currently in place to reduce the impacts of a spill, and describes the potential extent of a spill and the response actions that would occur. This section also describes the risks of fires or explosions related to the proposed action and the response actions that would occur in the event of a fire or explosion during vessel transport.

As noted in Chapter 3, Section 3.17, *Vessel Traffic*, operation of the proposed action would result in increased vessel traffic in the study area. The vessels would consist primarily of tug barges but could include the use of tankers. The actual mix of vessel type and size would be determined by the owner of the oil who contracts for ships to provide transport to or from the terminal. The decision is based on the distance of transport, fuel needs of the vessel, and the constraints of the receiving harbors and ports where the oil would be delivered. Under the proposed action, up to 400[2] vessels trips[3] would operate annually in Grays Harbor. These are assumed to be tank barges, although tankers could be used, which, because they can carry more product, would reduce the number of vessel trips.

4.6.2.1 Oil Spills

Oil Spill Risk

Typically, spills from vessels occur from operations (transferring fuel internally or transferring fuel to or from the vessel) or because of an incident such as a collision, grounding, or allision. Incidents can result from situations such as a loss or reduction of propulsion, loss of steering, or other equipment failure, as well as human errors.

Grays Harbor has navigational challenges, including a bar at the entrance to the harbor, a constrained navigation channel for deep-draft vessels, and sharp turns in the channel. The substrate of the channel is generally sand and mud, which, in addition to the requirement for vessels to be double-hulled, reduces the potential of spill due to groundings.

From 2008 to 2014, several vessel incidents occurred in Grays Harbor, including one methanol spill from a vessel. Five incidents were caused by loss or reduction in propulsion. One of these resulted in a vessel grounding with no damage or spill and one resulted in an allision with a buoy with no damage or spill. In 2011, a ship spilled 200 gallons of methanol to water because of human error in connecting a hose to a flange for a transfer.

In 1988, the barge *Nestucca* spilled 231,000 gallons (5,500 barrels) of heavy fuel oil along Washington State's outer coast, offshore of the entrance to Grays Harbor. The barge was being towed and the line broke after crossing the Grays Harbor bar. The tug collided with the barge and ripped a gash in the hull, causing a spill. The oil spill affected beaches as far south as Oregon and north to Vancouver, British Columbia. Because of the spill, the Washington State Department of Ecology (Ecology) Spills Program and the Pacific State – British Columbia Oil Spill Task Force were established. Since that incident, Washington State laws and federal laws for oil spill prevention, preparedness, and response were implemented, including requirements for double-hulled vessels and natural resource damages.

The report, *Oil Spill Risk in Industry Sectors Regulated by Washington State Department of Ecology Spills Program for Oil Spill Prevention and Preparedness* (Washington State Department of Ecology 2009) noted 14 oil spills from tankers from 1995 to 2008, with a total of 13,709 gallons (326 barrels) of oil spilled. The report also found 14 oils spills from tank barges for a total of 7,002

[2] Proposed vessel trips are total for the facility so are not in addition to trips attributable to the applicant under the no-action alternative (approximately 14 per year).
[3] A vessel trip represents a one-way trip; in other words, an inbound trip and an outbound trip count as two trips.

gallons (167 barrels). Both of these data points indicate that most spills are far less than a full discharge of contents. Another recent study (Glosten 2014) developed release probabilities that indicated 13 to 22% of incidents actually resulted in a spill. In the remaining 78 to 87% of the cases, there was no loss of cargo resulting from the incident.

A risk assessment was completed (Appendix M, *Risk Assessment Technical Report*) to determine the potential frequency of spills of different sizes based on planning requirements applicable to vessel transport. A tank vessel can suffer structural damage and a resulting spill of cargo as the result of a collision with another vessel, an allision with a fixed structure such as a jetty or pier, or a grounding. The evaluation of vessel transport risks considers all three events. The risk assessment applied incident rates for each of these types of events combined with the rate of release to the number of vessels anticipated for the proposed action for each scenario below. Appendix M provides a discussion of the risk scenarios and the methods used to determine spill frequencies.

Because of the increased number of vessel trips to and from the project site, the proposed action would result in the potential for more frequent spills of bulk liquids relative to the no-action alternative, although the orders of magnitude are very similar. The likelihood of very large releases would remain low. As noted previously, it is not possible to predict the timing or magnitude of an incident; therefore, to provide an understanding of risks under the proposed action, the following large spill scenarios were considered.

- **Vessel collision spill scenario:** vessel collision with another vessel resulting in a spill of up to 105,000 gallons (2,500 barrels).
- **Vessel grounding spill scenario:** vessel grounding resulting in a spill of up to one compartment of 1.2 million gallons (29,000 barrels).
- **Vessel allision spill scenario:** vessel allision with a fixed structure (e.g., jetty or pier) at the harbor entrance resulting in a spill of up to 15.1 million gallons (360,000 barrels).

The relative risks of the scenarios are shown graphically in Figure 4.6-2 and are summarized below. The potential impacts of exposure to spills are addressed in Section 4.7, *Impacts on Resources.*

Figure 4.6-2. Environmental Health Risks from Potential Spills during Vessel Transport—Proposed Action

The scenarios have the following likelihood of occurring under the proposed action.

- The **vessel collision spill scenario** could occur once in 74 years.
- The **vessel grounding spill scenario** could occur once in 270 years.
- The **vessel grounding spill scenario** could occur once in 210 years.

Additional analysis illustrates the potential spread and movement of spills from a vessel. Appendix N, *Oil Spill Modeling,* demonstrates that the movement of spilled oil in the harbor can vary dramatically, depending on the amount spilled, the location of the spill, material spilled, weather conditions, and flow conditions. Depending on the specific conditions, it is possible for spilled oil to reach the far shores of the estuary and even the Pacific Ocean from a vessel at the facility within 24 hours, or it may remain near the spill. The model does not include any response actions, which would be expected to occur for any spill. In general, the modeling shows that under summer conditions, most of the oil is pushed into the South Bay of the harbor and that under winter conditions, oil is more likely to move more quickly outside of the harbor into the ocean, depositing oil along beaches near the mouth. Oiling along the outer coast occurred during the *Nestucca* spill in 1988. Models and historical data indicate an oil spill originating from a vessel just outside of Grays Harbor could oil shorelines within Grays Harbor and along the outer coast. The oil, if uncontained, could travel as far north as Canada and south to Oregon depending on spill quantity and weather conditions at the time of the spill.

Oil Spill Prevention

As discussed in Section 4.2, *Applicable Regulations*, vessels transporting oil as cargo have construction design features (protective double bottoms and sides) and mechanical measures (oil discharge monitoring systems and emergency shutdown devices for the oil transfer system) to prevent spills. Vessel operators are required to develop and implement safety and contingency plans to ensure that appropriate protocols, equipment, and training are in place to reduce the chances and

extent of damage related to spills. Additionally, vessels use navigational equipment (depth sounders and electronic position fixing devices) to verify position and prevent collisions or groundings that all contribute to the prevention of oil discharges into the marine environment.

Containment Standards

Containment is required around each loading manifold, overfill pipe, and oil transfer connection point on the vessel. The containment is designed according to the size of the transfer hose to capture small spills and prevent the spill from reaching the water.

Double-Hull Construction Standards

Double hulls provide a measure of protection by creating a space between the outside of the vessel and oil tank areas. Both the tug barges and the crude oil tankers that would transport liquids for the proposed action would have double hulls. Yip et al. (2011) concluded that a double-hull design reduces the size of oil spills in incidents by 62% for tankers and 20% for tank barges.

Pollution Prevention Equipment and Requirements

Oil tankers and barges with an overall length of 400 feet or more are required to carry equipment for the containment and removal of on-deck oil spills of at least 12 barrels (33 CFR 155.205). The following materials must be carried.

- Sorbents
- Nonsparking hand scoops, shovels, and buckets
- Containers suitable for holding recovered waste
- Emulsifiers for deck cleaning
- Protective clothing
- A minimum of one nonsparking portable pump with hoses
- Scupper plugs

Oil Transfer Procedure Requirements

Formalized oil transfer procedures describe the roles and responsibilities of any personnel involved in oil transfers and the actions that should occur in the case of a spill. The transfer procedures required by 33 CFR 155.720 are as follows.

- Designate the person-in-charge who has the appropriate license, training, and familiarity with vessel equipment for the transfer operations.
- Have oil discharge removal equipment and supplies available.
- Describe the transfer procedures using the specific equipment on the ship.

Oil Spill Response

Vessel Contingency Planning

The site plan required for the proposed action would provide specific oil spill response actions and would include information on the specific equipment, valves, pipelines, and loading arms related to contingency planning for dockside spills. Typical actions for responding to a spill are as follows.

- Notify companies and agencies that are responsible for the cleanup effort.
- Stop the flow of oil, if possible, and prevent ignition.
- Ensure the safety of all response personnel and the public.
- Get trained personnel and equipment to the site quickly.
- Define the size, position, and content of the spill; its direction and speed of movement; and its likelihood of affecting sensitive habitats. Contain the spill to a limited area.
- Remove and dispose of the oil properly.

The owner or operator of the vessel must notify the National Response Center as required by federal law. The center will notify federal agencies, including the U.S. Coast Guard. State laws and regulations RCW 90.56 and WAC 173-182-262, Oil Spill Contingency Plan also requires the owner or operator to notify the Washington Emergency Management Division of a discharge or substantial threat of a discharge. The division will notify other state and local agencies, including Ecology. Notification must be made immediately upon the discharge or substantial threat of a discharge, or as soon as is feasible without further endangering the vessel or personnel.

The owner or operator activates the vessel contingency plan by making notifications and coordinates with Ecology and the U.S. Coast Guard to take any necessary actions to protect the public health, welfare, and natural resources of the state.

Geographic Response

The Grays Harbor and the Chehalis River Geographic Response Plans (GRPs) contain specific response strategies in the event of an oil spill (from any source) into or threatening waters and related environmental resources in the study area. For example, the Grays Harbor GRP contains response strategies relevant to an oil spill that could affect the lower Chehalis River (including response strategies related to tributaries or wetlands that connect to the river), the North and South Bays, and Bowerman Basin (near Grays Harbor airport). The Chehalis River GRP geographically covers the river from Cosmopolis, picking up where the Grays Harbor GRP ends, and follows the river southeast to Centralia, concluding at Pe Ell.

The GRPs describe response strategies such as placing boom to close off access of spilled oil into environmentally sensitive sites (such as Grass Creek in North Bay or Newskah Creek just to the south of Rennie Island). The boom also would deflect oil moving on the river or in the harbor into a containment area for collection (with vacuum trucks and sorbent materials), or divert oil away from areas that are sensitive or hard to clean. The GRPs also proposed culvert blocks or underflow dams to aid in shoreline protection and oil collection. The GRPs contain supplemental information related to the response strategies that support their implementation. For example, the Grays Harbor GRP

includes a table with recommended boom lengths, appropriate boom deflection angles, and the number of required anchors to support boom placement for a range of different current speeds. Predesignated staging area locations (for equipment and personnel) and relevant logistics for their use are clearly described.

The response strategies are prioritized in the GRPs to reflect the sensitivity of threatened environmental resources or potential public health concerns (as in the case of spill proximity to populated areas or water intakes). In some cases, economic considerations may dictate response priorities (for example preventing oil from affecting shellfish harvest areas or a marina). These priorities are discussed prior to a spill and reflected accordingly in the GRPs to prevent a delay in the allocation of potentially scarce response assets during an active spill response.

Each GRP identifies potential spill origin points. There is no attribution in the GRPs for the cause of the spill at the spill origin points. Each spill origin point has a multitude of associated response strategies within the GRPs due to the inevitable likelihood that spilled oil will spread on and flow with water until it is contained and removed. For example, the Grays Harbor GRP contains over 24 strategies to combat the spread of spilled oil from spill origin point designation GH-B, located near the mouth of the Chehalis River, in the lower southeast quadrant of Grays Harbor.

In addition to the site-specific information contained in the GRPs, there is relevant information in other sections of the larger Northwest Area Contingency Plan that supplement the site-specific strategies that would also address potential risks related to the proposed action. For example, Chapter 3000 – Operations, contains a section titled *Operational Safety Issues Associated with Bakken Crude Oil*. Section 9420 of the Northwest Area Contingency Plan, titled *Northwest Area Shoreline Countermeasures Manual and Matrices*, contains an in-depth description of 10 shoreline types (ranging from fine- to medium-grained sand beaches to salt and fresh water marshes) and appropriate cleanup considerations for each type.

4.6.2.2 Fires or Explosions

Fire or Explosion Risk

Crude oil and refined oils are carried in bulk by oil tankers and oil barges. A spill could cause fire or explosion if there is an ignition source and combustible gases are present in a quantity that could ignite.[4]

There is a Washington State record of an explosion on a tank vessel in November 1993. The tanker *Sea River Philadelphia* suffered an explosion in an inert gas compartment while moored in Anacortes. No one was injured and no oil was spilled. The cause of the explosion was inadequate maintenance procedures (Washington State Department of Ecology 2015: 44). Other tank vessel explosions in the United States between 1993 and 2013 were caused by human error and improper procedures or a combination of both (Table 4.6-1).

[4] The term *flammable liquid* means any liquid that gives off flammable vapors at or below 80°F. In general, crude oil is considered to be highly flammable. The term combustible liquid means any liquid having a flashpoint above 80°F. The regulations discussed in this section are applicable to either hazard.

Table 4.6-1. Tank Vessel Explosions in the United States, 1993 to 2013[a]

Date	Name of vessel	Location	Cause
April 24, 2013	Kirby barges 28182 and 28194 and Towing Vessel *Safety Runner*	Mobile, Alabama	High concentration of tank vapors from tank cleaning operations resulting in explosions on towing vessel and barges.
January 19, 2005	Tank Barge EMC 423	Chicago Sanitary and Ship Canal	Heating of a cargo pump with a propane torch accidently ignited vapors escaping through the standpipe.
October 9, 1993	OMI Charger	Galveston, Texas	Ignition of an explosive atmosphere with a welder's arc.

Sources: National Transportation Safety Board 2014 ; U.S. Coast Guard 1997, 2010

[a] The tank vessels in this table were not carrying crude oil. The OMI Charger was a single-skin tank ship that carried gasoline; the EMC 423 was a single- skin tank barge that was carrying clarified slurry oil; the Kirby barges (28182 and 28194) were being cleaned and had a total of about 11 barrels of residual natural gasoline (a liquid, flammable, first distillation of crude oil).

The risks of fires or explosions during vessel transport related to the proposed action are presented graphically in Figure 4.6-3. Additional information regarding the risks of fire and explosions during rail transport is provided in Appendix M, *Risk Assessment Technical Report*.

Figure 4.6-3. Environmental Health Risks from Potential Fires or Explosions during Vessel Transport—Proposed Action

Explosion Prevention

Regulating agencies have developed structural, mechanical, and procedural requirements to reduce the threat of a fire or explosion on tank vessels and barges. USCG vessel inspectors have the authority to inspect any tank vessel in U.S. waters for compliance with U.S. laws and international treaties and issue the certificates that represent this compliance for U.S. tank vessels. Ecology also conducts vessel inspections. Vessel classification societies also regularly survey vessels to ensure compliance. The following types of features prevent fires and explosions on tank vessels.

- Structural
  - Cargo piping must not pass through machinery spaces (a source of ignition).
  - Cargo pumps must be isolated and away from machinery spaces.
  - A venting system that prevents tanks from being over-pressurized while they are being loaded or if the product expands while being transported. Vapors are released high above the deck at the end of vent risers, away from potential ignition sources.
- Mechanical and electrical
  - Tankers use an inert gas system, which replaces air with an inert (nonflammable) gas in oil tanks. This system is used when offloading oil to remove potentially flammable gases and to provide an atmosphere that is not explosive.[5] Loading usually requires no additional inert gas if the tank is already inert: the incoming cargo will displace the inert gas in the tank, which is then vented. Monitoring equipment is required to verify the status of tank atmospheres during loading, unloading and transit.
  - Emergency steering system.
  - Remote manual shutdowns for cargo pump systems to shut down transfers quickly from multiple locations.
- Procedural
  - Crew training on proper oil transfer procedures and firefighting.
  - Prohibits any work that could provide an ignition source (e.g., welding).
  - Smoking prohibitions.

Explosion Response

Should a spill occur, the emergency response plan would address the roles, responsibilities, and actions to take, depending on how much was spilled, and where and whether ignition has already occurred. Typical responses to an explosion are as follows.

- Activate the marine firefighting and oil spill contingency plan.
- Make notifications.
- Account for all personnel and initiate search and rescue operations if necessary.
- Ensure the safety of all response personnel and the public.
- Conduct hazard assessment and risk evaluation and institute measures to protect the public if necessary (from airborne hazards caused by fire or additional, potential, explosion hazards).

[5] This requirement is based on the fact that when oxygen levels are under 8%, there is not sufficient oxygen to support combustion.

- Conduct continuous air monitoring, as appropriate.
- Conduct fire suppression operations, if appropriate.
- Initiate oil spill response activities, as appropriate.

4.6.3 What mitigation measures would reduce impacts related to vessel transport?

This section describes the applicant mitigation and other measures that would reduce onsite impacts on environmental health and safety from rail transportation related to the proposed action. These mitigation measures are in addition to regulatory compliance and best practices discussed above.

4.6.3.1 Applicant Mitigation

The applicant will implement the following mitigation.

- Due to sensitivity of the local environment, tribal resource concerns, and the potential presence of sensitive species, to reduce potential risk of incident due to loss of propulsion, loss of steering, grounding, or severe weather, the applicant will not receive or load crude oil to tankers or tank barges, unless the vessels have tug escorts through Grays Harbor as described below. This requirement will remain in place until rules are implemented pursuant to ESHB 1449, Section 12, at which time the rules will apply to the project.
    - At least one escort tug must accompany a laden tanker or tank barge carrying oil between the Hoquiam River and Grays Harbor entrance, and two tugs (one escort tug and one assist tug) must assist the vessel during mooring procedures.
    - For laden tankers, the escort tug must be appropriately tethered while transiting Grays Harbor.
    - Escort tugs must have an aggregate shaft horsepower equivalent to at least 5% of the deadweight tons of the escorted oil tanker or tank barge.
    - Escort tugs will have sufficient mechanical capabilities to provide for safe escort.
- To ensure adequate safety for tug operations and thereby reduce the risk of an incident, the applicant will not receive or load crude oil to tankers or tank barges unless the vessels supply Grays Harbor Pilots and tug companies with bollard pull capacities of the vessels prior to entering Grays Harbor.
- To reduce potential risk of incident of vessel collision or allision in Grays Harbor, the applicant will work with the U.S. Coast Guard, Ecology, Port of Grays Harbor, and Grays Harbor Safety Committee to propose, develop, and implement a formal vessel management system. The vessel management system will include the ability to schedule, track, and monitor vessel movements in the harbor and off the entrance to the harbor. The vessel management system will be active prior to the applicant beginning the proposed operations.

- To reduce potential risk of incident of vessel collision while in Grays Harbor, the vessel management system should act as follows.
  - Ensure vessel traffic is limited while a laden tank vessel is in the navigation channel.
  - Prohibit the transit of any other deep-draft vessels within the South Reach of the navigation channel (just off Westport) to Terminal 1 in both directions whenever a laden tank vessel is transiting within the same channel.
  - Include real-time Automatic Identification System tracking and monitoring.
- To reduce the risk of a fire or explosion from tank barges, the applicant will not receive or supply Bakken crude oil to tank barges unless the tank barges are able to inert their tanks when carrying Bakken crude oil.
- To reduce the risk of an incident, the applicant will coordinate with the Port of Grays Harbor and as a member of the Grays Harbor Safety Committee, work to develop and implement specific procedures for escorting, tethering, and emergency maneuvering to control laden tank vessels. The procedures must be drafted prior to the proposed operations beginning. These procedures should be included in the Grays Harbor Safety Plan. At a minimum, these must include the following elements.
  - Escort configurations and maneuvering characteristics of escorted tankers and tank barges.
  - Specific emergency connection and tethering procedures for connection of tugs to tankers and tank barges.
  - Specific maneuvers necessary for the tug to maintain control of the tanker while transiting Grays Harbor waters specifically during incidents of loss of propulsion or steering.
  - Appropriate safe speed of transit in Grays Harbor when tugs are tethered.
  - Guidelines for tanker or tank barge bridge team to rapidly recognize and respond to a loss of power or steering. By improving recognition and reaction time, the tug can more effectively steer the vessel through the navigation channel upon incident.
  - Requirement for a pretransit conference.
  - Refueling operations.
- To reduce the risk of an incident during vessel refueling, the applicant will ensure that any tank barges loaded with fuel for purposes of refueling vessels at the project site follow the navigation and safety mitigation measures for crude oil tank barges described in this section.
- To improve response times and increase coordination of responses, the applicant will develop and implement a program approved by Ecology to educate its tankers and tank barge customers on the reporting requirements for vessel incidents resulting in a threat of a spill under Revised Code of Washington 88.46.100, Notification of Vessel Emergencies Resulting in Discharge of Oil, prior to beginning the proposed operations.

- To improve response times and communication in the event of an incident that could affect commercial or recreational fishing, the applicant will develop a method for provide information on potential incidents to commercial and recreational fishing boats and will describe this measure in the oil spill contingency plan prior to beginning operations.

4.6.3.2 Other Measures to Be Considered

Potential impacts associated with the proposed action could be further reduced by implementing the following measures.

- To reduce the risk of an incident, the Grays Harbor pilots, Port of Grays Harbor, and tug company operating under contract with the Port of Grays Harbor should conduct the following training.
  - Regular training between the pilots and tug crews to ensure that the tugs will be able to meet the pilot's expectations during an emergency.
  - Exercises or drills to demonstrate appropriate emergency connection and tethering.
- To reduce potential risk of incident or vessel collision or allision in Grays Harbor, the Port of Grays Harbor, Grays Harbor Safety Committee, and the U.S Coast Guard should research the need for vessel traffic service for Grays Harbor and, if needed, implement a vessel traffic service.
- To reduce potential risk of incident of vessel collision while in Grays Harbor, the Port of Grays Harbor and USCG should research the need for a one-way channel transit along the inner harbor for laden tank vessels and, if needed, revise regulations.
- To improve safety during high traffic or bad weather conditions or in the case of an incident, the Grays Harbor Safety Committee should work with USCG to designate an anchorage in Grays Harbor with specific requirements for tank vessels as described in 33 CFR 109.07.
- To reduce the potential risk of vessel incidents due to lack of knowledge of local conditions, the Port of Grays Harbor should require all tanks vessels and barges to take a Grays Harbor pilot while transiting Grays Harbor waters.
- To improve safety in Grays Harbor, the Port of Grays Harbor should conduct annual assessments on pilot availability and capacity to meet projected increases in vessel traffic.

4.6.4 Would the proposed action result in unavoidable and significant adverse environmental impacts related to vessel transport?

A large oil spill or explosion would likely cause unavoidable and significant adverse environmental impacts. As described above, the likelihood of a large spill or related explosion is low; however, the potential for significant consequences to the environment and human health in the case of a large spill or explosion is high. The specific impacts would vary based on the location, amount spilled, type of liquid, and weather conditions. Examples of these impacts are described in Section 4.7, *Impacts on Resources*. Regulatory requirements for the prevention of, preparedness for, and response to a large spill or explosion and mitigation measures to reduce impacts are detailed above. However, no

mitigation measures would completely eliminate the possibility of a large spill or explosion, nor would they completely eliminate the adverse consequences of a large spill or explosion.

4.6.5 Who would pay for the response and cleanup of a vessel transport spill?

Washington State law requires the operators of tankers and tank barges transporting hazardous substances to provide evidence of financial responsibility. Under RCW 88.40.020, Evidence of Financial Responsibility, tank vessels that transport oil in bulk as cargo must demonstrate financial responsibility to pay at least 1 billion dollars. With a few limited exceptions, federal law requires vessel operators (all types of vessels) to have a Certificate of Financial Responsibility for vessels over 300 gross tons using the navigable waters of the United States (33 CFR 138.15). The certificate is evidence to the U.S. Coast Guard that the vessel owner or operator can meet their oil spill removal obligations under the Oil Pollution Act should they spill oil into the navigable waters of the United States.

Washington State places no limits on liability of third parties, allowing the state to recover cleanup costs and natural resource damages beyond the federal limit. The federal limits of liability for oil spill removal costs related to tank vessels are summarized in Table 4.6-2.

Table 4.6-2. Limits of Liability for Tank Vessels

Reference	Applicability	Limits of Liability
33 CFR 138.230(a)(2)	Tank vessels greater than 3,000 gross tons	The greater of $2,000 per gross ton or $17,088,000
33 CFR 138.230(a)(4)	Tank vessels equal to or less than 3,000 gross tons	The greater of $2,000 per gross ton or $4,272,000

CFR = Code of Federal Regulations; RCW = Revised Code of Washington

4.7 Impacts on Resources

Implementation of the regulatory requirements identified in Section 4.2, *Applicable Regulations*, and the mitigation measures described for environmental health risks at the terminal (onsite), related to rail transport, and related to vessel transport (Sections 4.4.3, 4.5.3, and 4.6.3, respectively), would reduce the chances of a spill occurring and would improve emergency response in the event that a spill did occur. However, some risks would remain and it is possible that the proposed bulk liquids, including crude oil could still enter the environment.

This section addresses the potential impacts of the proposed bulk liquids, including crude oil on the human and natural environment. More specifically, this section addresses the types of impacts that could occur if oil spills or fires affected water, plants, or animals, or aesthetic, recreational, cultural, or tribal resources. This section also generally describes the potential impacts of spills, fires, or explosions on human health. The extent of the damage would depend on various unpredictable factors; however, due to the sensitivity of natural and human resources in the study area, depending on the extent of the environmental damage, the potential impacts on the sensitive resources identified below could be significant.

4.7.1 What would be the environmental impacts of a spill?

The impacts of a spill would be most affected by the magnitude of the spill (small, slow leak in a contained area or a large, uncontained amount), the type of liquid, the location (on land or in water). The greatest potential for environmental harm could occur when larger releases enter or directly occur in waterways. In water, spilled materials can spread quickly, depending on the weather and geography. As discussed previously, cleanup and recovery actions would vary based on the spill and resources affected.

4.7.1.1 Water

Surface Waters

Spills into adjacent surface waters or onto the ground at the project site, along the PS&P line, or in the harbor could contaminate marine and inland waters, associated wetlands, and underlying groundwater. The spilled material could expose aquatic and terrestrial plants and animals, aquatic habitats, shorelines, sediments, and humans to contamination.

With respect to the proposed bulk liquids, their behavior in water depends on whether they are crude oil and refined petroleum fuels, or nonpetroleum and primarily plant-based fuels. Unrefined fuels would consist of crude oil and refined petroleum fuels would consist of gasoline, kerosene, naphtha, jet fuels, no. 2 fuel oils, no. 6 fuel oils, and vacuum gas oil. Plant-based fuels would be those that were purely plant-based or that were blended with plant-based materials, such as ethanol, renewable jet fuel, renewable diesel, or used cooking oil or animal fat.

The type, duration, and extent of water resource impacts caused by releases of these potential contaminants depend on numerous factors. These include the type and quantity of the spilled material, location of the release, physical and biological features of the affected environment,

sensitivity of various species to the hazardous material, and the material that is encountered (International Tanker Owners Pollution Federation Limited 2011a).

Groundwater

Spills could enter groundwater by infiltration (percolating through the soil column to the water table). This could contaminate municipal and private drinking water wells and other types of wells (e.g., irrigation, industrial supply). Contaminants dissolved in groundwater can also be transported into down-gradient surface waters that are fed by groundwater discharge, degrading surface water quality and potentially affecting aquatic life in those resources (Heath 1989:66–67).

In the study area, the highest risk of groundwater contamination from spilled crude oil and other petroleum and nonpetroleum products would be along the PS&P rail line, which runs through several areas underlain by largely unconfined surficial[1] aquifers. These aquifers are known to interact with surficial water features (e.g., rivers, streams), generally receiving discharge from these features during the winter when river stages are high and discharging to rivers and stream during the summer when river stages are low (Gendaszek 2011:10). Several wells within 0.25 mile of the PS&P rail line provide drinking water for private residences and municipalities, as well as water for irrigation and industrial uses (Washington State Department of Ecology 2015). The PS&P rail line also crosses through a mapped Critical Aquifer Recharge Area[2] around the Black River and Scatter Creek in Thurston County (Thurston County Washington 2010).

4.7.1.2 Plants

The primary impacts on plants from exposure to oil or the other proposed bulk liquids would occur through direct physical and chemical mechanisms as well as through chronic or more persistent mechanisms if a prolonged exposure occurred. These mechanisms are summarized in Table 4.7-1.

The nature and duration of these effects would depend on factors such as the type and quantity of the material released, location of the release (e.g., land or in water), the potential for ignition, physical and biological features of the affected environment (e.g., topography), sensitivity of various species to pollution, and the form of the material that is encountered. In addition to the effects of exposure to released materials, organisms can be damaged by physical and chemical aspects of spill response and cleanup efforts.

The greatest potential for the most extensive environmental exposure would involve a large spill directly to surface waters because the oil could be transported to a much wider geographic area. For these reasons, the subsequent discussion focuses on the potential for impacts on plants for a larger-scale release within Grays Harbor or the Chehalis River.

If a plant comes into direct contact with crude oil or the other contaminants, constituent compounds (e.g., polycyclic aromatic hydrocarbons) can cause acute toxicity, resulting in tissue necrosis and loss

[1] Surficial aquifers are defined as the uppermost saturated zone, typically an unconfined aquifer, or mappable extreme (Washington State Department of Ecology 1998:v). Surficial aquifers in the Chehalis River watershed typically lie only a few feet below land surface and extend to a depth no more than 100 feet.
[2] The Washington State Growth Management Act defines CARAs as areas that have a critical recharging effect on aquifers used as drinking water sources where the aquifer is vulnerable to contamination that could affect the potability of the water (WAC 365-190-030[3]).

of photosynthetic ability. Releases of light refined oils (e.g., jet fuel, kerosene, no. 2 fuel oil, diesel) in confined water bodies or directly into marshes can also result in high direct mortality of marsh vegetation (Michel and Rutherford 2013:2-2–2-5). These materials are generally volatile and highly flammable, but also evaporate and dissolve in water more quickly than crude oil. However, their generally low viscosity also allows them to easily migrate into sediments.

Depending on the amount of a plant's surface that is coated, crude oils and heavy refined oils can destroy plant tissues through direct toxicity and can reduce photosynthesis, oxygen transfer to the roots, and respiration to the point where the aboveground portion of the plant dies. Regrowth from below ground roots and rhizomes is possible within one to two growing seasons, although 3 to 5 years is a typical recovery period for salt marshes such as are present along the shores of Grays Harbor and the lower Chehalis River (International Tanker Owners Pollution Federation Limited 2011a:4; Michel and Rutherford 2013:2-21). Subacute effects on plants can also include reductions in growth or reproductive success, and reduced resistance to environmental stressors.

The specific impacts in the study area would also depend on the time of year and would vary by plant species. In the Grays Harbor area, perennial marsh and shoreline vegetation species begin resprouting from underground roots and rhizomes in early spring and continue to grow through summer, reaching maximum biomass in early autumn. Coating on stems and leaves and reductions in photosynthetic ability in the beginning of the growing season can affect perennial species more than would otherwise occur during the dormant winter season. Recovery of marsh vegetation is more rapid if a release were to occur during the nongrowing season (Michel and Rutherford 2013:2-15). Annual species (which grow each year from seed) are generally more vulnerable than perennial species, but also are typically the first species to recolonize heavily damaged areas (Michel and Rutherford 2013:2-16). If the roots or rhizomes die due to contact with spilled oils, the plant would die, and recovery would depend on the spread and regrowth of plants from outside the affected area.

Dispersed oil in the water column can also affect floating plants (phytoplankton), nonfloating kelp, and primary consumers (zooplankton) typically through direct toxicity. This affects, at least temporarily, the base of the estuarine and marine food web, which, depending on the extent (in size and duration) of the damage, can result in broader ecological damage.

Persistence in the environment and prolonged impacts on vegetation would also depend on the location of the release. Crude oil that reaches the shoreline could coat the physical substrates of the intertidal zone and shoreline. Rocky substrates (e.g., jetties at the mouth of Grays Harbor), once coated, can be cleaned by the mechanical action of waves. In contrast, pebble and sand beaches, such as line the Pacific shoreline north and south of the mouth of Grays Harbor, the substrates that support nonfloating kelp areas, and the mudflats and tidal marshes that are the dominant intertidal habitat in Grays Harbor, are at a higher risk of contamination from persistent effects in the event of a larger-scale release. If such an event were to happen, oil could seep into pore spaces and reach plant stem and root channels and benthic invertebrate burrows. Once oil enters these small pores, it can be very difficult to access and clean up contaminated areas. Heavier and more viscous oils, such as bitumen, may be more likely to remain trapped in pore spaces and thus be more difficult to remove (International Tanker Owners Pollution Federation Limited 2011a:6). High viscosity oils can also form "asphalt pavements"—the oil oxidizes in small pore spaces into hard pavement that can persist for decades (International Tanker Owners Pollution Federation Limited 2011b:7).

Sensitive Areas in the Study Area

Grays Harbor Shoreline, Chehalis River Surge Plain Natural Area and Grays Harbor National Wildlife Refuge (Bowerman Basin)

If a large-scale release were to occur in Grays Harbor or the Chehalis River, the various species of tidal salt marsh plants that fringe the shoreline of Grays Harbor, as well as the tidal surge plain wetland plant communities that characterize the Chehalis River Surge Plain Natural Area Preserve (Figure 3.4-2) and Bowerman Basin, could be affected. Depending on the circumstances, these sensitive areas could be affected through the specific mechanisms discussed above.

Any hazardous materials reaching the shoreline of Grays Harbor could affect macroalgae, nonfloating kelp, tidal marsh plants, aquatic plants, and shoreline/riparian plants directly through coating (as described for floating oil), as well as through acute contact with toxic components of the hazardous materials and sub-acute effects described above.

Tidal marshes and mudflats in the study area are particularly vulnerable to coating and retention of contaminants in sediments and to secondary effects related to increased erosion resulting in changes to the dynamics of the tidal zone that can affect plant species diversity. Depending on the circumstances, releases can be swiftly transported deep into tidal marshes and mudflats by tidal channels. Once trapped in low-energy, sheltered areas, contaminants can permeate the fine-grained mud and sand sediments and can persist in buried layers for long periods (International Tanker Owners Pollution Federation Limited 2011b:6–7; 2011a:7). If extensive areas of tidal marsh are affected, such as might occur in the case of a catastrophic spill, the plants stems and roots could cease to collect and hold sediments, which can lead to increased erosion of the marsh surface. Through this secondary mechanism of sediment loss, catastrophic hazardous materials releases can indirectly result in broader losses of marsh area that persist over time; this phenomenon has been observed in *Spartina* marshes in Louisiana oiled during the British Petroleum Deepwater Horizon crude oil spill (Silliman et al. 2012). Because tidal marsh species dominance and diversity in Grays Harbor (and other Pacific Northwest estuaries) is partially driven by elevation of the tidal zone, changes in erosion and sedimentation could also alter the amount and configuration of high marsh and low marsh plant communities.

Recovery time of tidal marshes is generally fastest in warmer climates, when the released materials are less persistent (e.g., lighter to medium crude oils), and when primarily sediments and not plants are coated. Recovery of tidal marshes is generally the longest in colder climates, when releases occur near sheltered settings, and when the released materials are more persistent (e.g., light refined products with heavy crude oils) (Michel and Rutherford 2013:2-21).

Vegetation along the PS&P Rail Line

If a larger-scale spill occurred along the PS&P rail line, contaminants could enter waterways at numerous crossings and drain to the Chehalis River, and eventually into Grays Harbor. Although it is not possible to know where a release might occur, the environmental outcome of such an event would be worse if it occurred in areas that supported unique or sensitive plant populations. For example, if a spill occurred along the north side of the PS&P rail line near Rochester and to the east of Scatter Creek, it could affect populations of the white-topped aster (U.S. Fish and Wildlife Species of Concern, Washington Natural Heritage Program Sensitive Species), previously recorded in two locations adjacent to the rail line. Similarly, a spill near the Centralia PS&P rail yard or along the rail

line near US Route 2 (US 2) and Prairie Creek could affect multiple recently documented occurrences of the small-flowered trillium (Washington Natural Heritage Program Sensitive Species).

As discussed in Sections, 4.4, *Environmental Health Risks—Terminal (Onsite)*, 4.5, *Environmental Health Risks—Rail Transport*, and 4.6, *Environmental Health Risks—Vessel Transport*, numerous measures and protocols are in place to prevent and minimize the extent of a spill once it occurs. These measures aimed at minimizing the frequency of a potential spill and the extent of the spill would reduce the potential for adverse impacts on plants. However, no mitigation measures can be implemented that will completely eliminate the possibility of a large spill, nor are there any mitigation measures that will completely eliminate the adverse consequences of a large spill.

4.7.1.3 Animals

Spills can affect animals because of both physical surface oiling or smothering and toxic effects of constituents in oil. Animals can also be injured by physical and chemical aspects of response and cleanup efforts. The potential impacts on animals are discussed in the context of floating spills, contact in the water column, contact along the shoreline, and contact on land. The mechanisms of impact are summarized in Table 4.7-1.

Marine Animals

Impacts from Oil at the Water Surface

Animals that would most likely be affected by floating oil in the study area include common diving birds that frequent Grays Harbor, such as double-crested cormorants, pied-billed grebe, belted kingfisher, Caspian tern, and common mergansers (Grays Harbor Audubon Society 2008), as well as common marine mammals such as harbor seals and California sea lions. Federally protected species such as killer whales, humpback whales, and sea turtles such as leatherback and green sea turtles might visit Grays Harbor (although rarely) and can be seasonally present in adjacent Pacific coast waters. Because sea turtles must come to the surface to breath, they could suffer the toxic affects by breathing in or ingesting floating oil, and adults could suffer mucous membrane inflammation (increasing susceptibility to infection) from the oil or its fumes (International Tanker Owners Pollution Federation Limited 2011b:6). Similarly, pelagic bird species commonly found off the coastline of Grays Harbor, such as pink-footed shearwater, black footed albatross, and northern fulmar (Grays Harbor Audubon Society 2008), would most likely be affected by floating oil in Pacific coastal waters. Semiaquatic mammals present in the Chehalis River such as beavers and river otters are examples of fur-covered animals that feed by diving through the water's surface and would most likely be affected by floating oil through loss of insulation, oil ingestion, or inhalation of toxic fumes (Crosby et al. 2013:79).

Oil floating on the water surface would pose the greatest risk to animals that are completely dependent on the marine or estuarine environment (such as seabirds and aquatic species, including marine mammals) and that come to the water surface to breath or dive through the surface to forage for food. Aquatic animals that breach the water surface or birds that land on water in an area with floating oil could ingest oil, inhale oil, or inhale its vapors and become physically coated with oil. Constituent compounds within oil (e.g., polycyclic aromatic hydrocarbons) can be acutely toxic to animals and cause death by contact or ingestion. Many birds and mammals, including harbor seals, California sea lions and possibly, killer whales and humpback whales could ingest oil in their efforts

to clean themselves or as they are feeding, which could result in rapid mortality or organ damage and subsequent death. Ingestion of crude oils and other petroleum products also can suppress the immune system of animals and cause skin irritation or ulceration, adrenal system damage, and behavioral changes, which could ultimately lead to death (U.S. Fish and Wildlife Service 2004, 2010). Physical coating (oiling) of an animal with floating oil can cause animals to suffocate if it coats or enters the respiratory tract. Oil coating can also cause a loss of thermoregulatory ability, ultimately leading to hypothermia, as well as loss of buoyancy and lift, which can drown animals or prevent them from flying or feeding successfully (Cedre 2008:49–50; Crosby et al. 2013:79–80). Other aquatic animals and birds that have not been directly exposed to a floating oil spill, such as scavengers (e.g., bald eagles), can be exposed to oil by feeding on injured or dead aquatic animals (e.g., fish) that have been in contact with and contaminated by oil floating on the water surface.

Impacts from Oil in the Water Column

Animals that feed or respire directly in the water (below the surface) are most at risk from impacts of submerged oil dispersed in the water column, particularly if natural or chemical dispersion causes the oil to persist in the water column for multiple days. The animals in the study area that would be most affected by submerged oil include marine mammals, invertebrates, and fish, as described in Chapter 3, Section 3.5, *Animals*.

Constituent compounds within oil can be acutely toxic to animals in the water column and cause death by contact with gills or ingestion. Submerged and dispersed oil that comes into contact with animals can clog and destroy sensitive tissues such as gills and mucous membranes necessary for respiration (e.g., fish and marine mammals) and filtering organs necessary for feeding (e.g., sessile organisms like barnacles, clams, and mussels) (Cedre 2008:50). Other potential effects of oil on fish include reduced growth, enlarged livers, changes in heart and respiration rates, fin erosion, and impaired reproduction and development (U.S. Fish and Wildlife Service 2004, 2010). Recent field and laboratory studies of Gulf killifish that reside in the Gulf of Mexico showed a variety of sublethal responses to oiled sediments. These responses include developmental abnormalities in larval and adult fish, cardiovascular defects in embryonic fish, and delayed hatching and smaller size at hatching of juveniles (Michel and Rutherford 2013:2–18). Those effects in turn increase the chances of direct mortality or capture by predators.

Potential oil effects on invertebrates include physical smothering, altering metabolic and feeding rates, and altering shell formation (U.S. Fish and Wildlife Service 2004). In addition, oil can contaminate plankton (microscopic floating organisms), which includes algae, fish eggs, and the larvae of various invertebrates; fish that feed on these organisms can subsequently become contaminated (U.S. Fish and Wildlife Service 2004).

Oil spilled into Grays Harbor or the Chehalis River or tributaries that cross the PS&P rail line could affect the survival of eggs and larvae, including salmonids protected under the Endangered Species Act. Fish mortalities have been associated with spills that result in localized concentrations of oil in the water column, large quantities of highly toxic light oils into breaking surf along a shoreline, and spills in rivers (International Tanker Owners Pollution Federation Limited 2011b:5). Salmon eggs and larvae are highly sensitive to oil toxins, which could result in reduced spawning success (U.S. Fish and Wildlife Service 2004, 2010). Subacute effects on animals can include reduced feeding, increased larval or juvenile mortality, delayed or reduced reproduction, or increased risk of predation due to behavioral changes.

Impacts from Oil along Shoreline and Intertidal Habitats

Oil spilled close to shorelines and intertidal habitats or floating oil that reaches these areas can affect animals that inhabit or transit shoreline and intertidal habitats (e.g., shorebirds, river otters, seals). Oils along the shorelines can also affect invertebrates (e.g., shellfish) that live in the sand on rocks, in mudflats and transitional wetland areas. The toxic and smothering effects of oil on animals described above for oil on the water surface and in the water column would generally be the same for animals along the shoreline and intertidal environment that could be exposed to oil.

Common benthic invertebrates in Grays Harbor marshes and intertidal mudflats include various species of clams and snails, as well as intertidal crabs (e.g., red rock crabs and Dungeness crabs), which burrow in the substrates of these habitats. Oil that sinks and binds with sediments in these habitats can become trapped, resulting in smothering or toxic effects in benthic invertebrates. High rates of intertidal crab mortality have been documented following oil spills the reached salt marshes in Massachusetts, New York, New Jersey, and Nigeria (Michel and Rutherford 2013:2-17). Potential oil effects on invertebrates can include mortality or injury from physical smothering, altering metabolic and feeding rates, and altering shell formation (U.S. Fish and Wildlife Service 2004). Birds that forage for benthic invertebrates along beaches, shorelines, and mudflats would also be exposed to oil and contaminated invertebrates; common bird species in Grays Harbor that feed on invertebrates on the beach and mudflats include shorebirds such as western sandpiper, dunlin, and sanderling (Grays Harbor Audubon Society 2008). Common diving ducks such as bufflehead and common goldeneye also feed on invertebrates several feet under water (Grays Harbor Audubon Society 2008).

Oil spills could pose a higher risk to migrating or nesting birds in the study area because populations may concentrate in one area (e.g., migratory flocks of shorebirds). A much wider range and larger number of species would potentially be affected if an oil spill were to occur along the shoreline beyond Grays Harbor and intertidal habitats during the nesting season and the spring and fall migrations. Salt marsh, mudflat, and beaches of Grays Harbor and the Grays Harbor National Wildlife Refuge support a seasonal concentration of hundreds of thousands of shorebirds migrating north between late April and early May each year (U.S. Fish and Wildlife Service 2014). Birds that forage along the shoreline and intertidal environment could be exposed to oil and could suffer the same effects as birds that encounter oil on the surface of the water, although they might be less likely to be fully coated by oil. Birds foraging on invertebrates in these areas would ingest oils along with contaminated prey, resulting in the same toxic effects as described above (e.g., immunosuppression, skin irritation or ulceration, adrenal system damage, and behavioral changes, which could ultimately lead to death [U.S. Fish and Wildlife Service 2004, 2010]). Other animals and birds that have not been directly exposed to an oil spill, such as scavengers, can be exposed to oil by feeding on injured or dead birds that have been in contact with and contaminated by oil along the shoreline environment.

Animals that transit shoreline and intertidal habitats in the study area, such as harbor seals and river otters, also could be exposed to an oil spill along these habitats. These animals could ingest oil, inhale oil or its vapors, and physically be coated with oil. These mammals could suffer the same toxic effects as described above for marine mammals and birds (e.g., acute mortality and sub-lethal effects such as immunosuppression and behavioral changes, which could ultimately lead to death). Harbor seals could accumulate some of the oil constituents (e.g., polycyclic aromatic hydrocarbons) in their blubber and pass them along to their pups in maternal milkfats. Physical coating of river otters could

cause hypothermia. Ingestion of oils from self-grooming or consumption of contaminated prey could lead to similar toxic effects, as noted for birds and other mammals above.

Persistent effects of oil retained in sediments along shoreline and intertidal habitats, such as marsh plant death and consequent sediment loss, can concurrently change the diversity and abundance of animal species that use these habitats. Changes or loss of plant community structure can alter the ecological services of those communities, such as nursery areas for fish, until such time as the original or similar community structure can redevelop (International Tanker Owners Pollution Federation Limited 2011b: 3-4). Persistent or chronic effects on animal life also can result when oil strongly affects key animals that create physical habitat structure (e.g., mussels). This can lead to changes in the structure and functioning of both plant and animal communities. For example, high mortality of ribbed mussels was noted in several spills along the east coast in Spartina marshes, including the 1969 spill of almost 200,000 gallons of No. 2 fuel oil from the fuel barge Florida in Buzzards Bay Massachusetts. The mussels bind the root mat of east coast Spartina marshes together, and heavy mortality can accelerate local marsh erosion; persistent oil was still present in the soil 30 years after the spill and continued to affect ribbed mussel, fiddler crab, and marsh vegetation (Michel and Rutherford 2013:2-18, A-1).

Terrestrial Animals

Oil spills in the vegetated terrestrial environment could occur during rail transport and could affect terrestrial animals and their habitats. Similar to species that depend on the aquatic environment, oil spills can affect terrestrial animals as a result of both physical smothering and toxic effects. Animals that contact oil could be physically coated, inhale its vapors, or ingest oil when foraging or grooming. Effects similar to those described above for aquatic and semiaquatic animals could occur. Common terrestrial animal species that could be affected by an oil spill along the PS&P rail line are described in Chapter 3, Section 3.5, *Animals*. In addition, any degradation of habitat from oil could displace animals by forcing them to abandon the area in search of more suitable habitat. This could result in significant impairment of normal behavioral patterns, and could reduce reproduction and survival, as individuals would expend energy looking for other habitat and attempting to insert into areas already defended by other animals of the same species.

An oil spill to land, however, is likely to cover a much smaller geographic area than a spill of the same quantity of oil to surface waters. Thus, a smaller proportion of local terrestrial animal populations might be impacted, possibly without long-term obvious impacts on local populations of birds or mammals. Frogs and other amphibians, however, might suffer localized mortality and reduced reproductive success if oil spills to land reach freshwater pools and ponds used for breeding.

Sensitive Areas in the Study Area

Sensitive areas within the study area where there would be concern for oil spills include areas identified as having important habitat characteristics that support sensitive species or refuge and preserve areas designated by a state or federal agency that support a high diversity of animals. The U.S. Fish and Wildlife Service designated critical habitat in several areas along the PS&P rail line for the federally listed bull trout (fish) and marbled murrelet (bird), and has proposed critical habitat for the Oregon spotted frog.

The PS&P rail line crosses three streams designated as critical habitat for bull trout: the Wishkah, Satsop, and Wynoochee Rivers. In addition, the PS&P rail line runs adjacent to the Chehalis River (also designated as critical habitat for bull trout), and is particularly close to the river between Oakville to just south of Elma. In the study area, all four rivers provide important foraging, migration, and overwintering critical habitats for bull trout.

The PS&P rail line is also adjacent to three areas of marbled murrelet critical habitat around the Oakville area and is adjacent to proposed critical habitat for Oregon spotted frog near the Black River crossing. An oil spill from a train that reached one or more of these critical habitats could cause adverse effects on survival and reproduction that could further compromise the existing populations.

The Washington State Department of Natural Resources' Chehalis River Surge Plain Natural Area and the U.S. Fish and Wildlife Service's Grays Harbor National Wildlife Refuge are higher quality ecosystems in the study area that support a variety of animals, including several sensitive species. The PS&P rail line runs along the northern boundary of the Chehalis River Surge Plain Natural Area, and the Grays Harbor National Wildlife Refuge is part of Grays Harbor. An oil spill from a train along this area that would be exposed to animals could result in physical smothering and toxic effects; the resulting impacts would be the same as what has already been described above. In addition, any degradation of habitat in this area from oil could displace uncontaminated animals, possibly causing reduced survival and reproduction as described above. Similar impacts would be expected if a vessel were to spill oil in Grays Harbor that would reach the Grays Harbor National Wildlife Refuge.

The U.S. Fish and Wildlife Service has designated critical habitat for the federally listed bull trout and the National Marine Fisheries Service has designated critical habitat for the federally listed green sturgeon in Grays Harbor. An oil spill from a vessel that would be exposed to these species in Grays Harbor could result in physical smothering and toxic effects, with increased mortality and reduced reproduction for affected animals as described above. As noted in Chapter 3, Section 3.5, *Animals*, Grays Harbor estuary is located along the Pacific Flyway, a migratory flight corridor between Alaska and South America. It is one of four major staging areas for migrating shorebirds in North America, with shorebirds congregating in the mudflats to feed and rest during spring and fall migrations. Approximately 24 species of shorebirds use the Grays Harbor National Wildlife Refuge during migrations, which begin in late April and continue through mid-May. The applicant has committed to cease all vessel-loading operations for a 2-week period each year during the Grays Harbor Shorebird Festival. This would reduce the potential risks of affecting shorebirds during this key migratory period.

Numerous measures and protocols are in place to prevent and minimize the extent of a spill once it occurs. These measures aimed at minimizing the frequency of a potential spill and the extent of the spill would reduce the potential for adverse impacts on animals. However, no mitigation measures can be implemented that will completely eliminate the possibility of a large spill, nor are there any mitigation measures that will completely eliminate the adverse consequences of a large spill.

Table 4.7-1. Chemical Properties and Mechanisms of Impact on Plants and Animals

State or Condition	Products	Density	Properties and Potential Release Behavior	General Types of Acute Physical and Chemical Impacts		Potential Persistent/Chronic Impacts	
				Plants	Animals	Plants	Animals
Petroleum-Based Fuels							
Refined	Gasoline Kerosene Naphtha Jet fuels	Specific gravity 0.79; API 46-49 Specific gravity <0.8; API 45 Specific gravity <0.8; API 55 Specific gravity 0.76 - 0.82	These materials typically float based on their specific gravity; generally volatile and highly flammable; evaporate and dissolve relatively rapidly in water; low viscosity and can migrate into sediments; direct contact can cause acute toxicity to plants and animals	Leaf/stem/root necrosis and death due to toxicity of material	· Inhalation of toxic fumes · Ingestion inhalation · Organ damage · Skin ulcerations	· Plant death and physical disturbance changes dominant plant species and community structure · Fires can heat soil to point of near sterilization · Can produce methanogenic compounds in the subsurface	Biodegradation may decrease the dissolved oxygen in surface water resulting in fish kills
	No. 2 Fuel Oils	Specific gravity 0.86; API	Behaves more like crude oil (see below)	Behaves more like crude oil (see below)	Behaves more like crude oil (see below)	Behaves more like crude oil (see below)	Behaves more like crude oil (see below)
	No.6 Fuel Oils	Specific gravity 0.95 - 1.03; API 5.2 - 23.1	Behaves more like crude oil (see below)	Behaves more like crude oil (see below)	Behaves more like crude oil (see below)	Behaves more like crude oil (see below)	Behaves more like crude oil (see below)
	Vacuum gas oil	Specific gravity 0.93; API NA	Behaves more like crude oil (see below)	Behaves more like crude oil (see below)	Behaves more like crude oil (see below)	Behaves more like crude oil (see below)	Behaves more like crude oil (see below)
Unrefined	Crude Oil - Bakken origin	Specific gravity 0.8 - 0.86; API 45	Typically floats on water; acute toxic in undiluted form; higher gas content, higher vapor pressure, lower flash point and boiling point, and higher degree of volatility than most other crude oils; increased ignitability and flammability	· Physical smothering of leaves and soil (loss of photosynthesis and respiration) · Photosynthetic reduction and reduced carbohydrate storage in roots · Leaf/stem/root	· Smothering/ drowning · Drowning due to lost buoyancy · Lost insulation and hypothermia · Inhalation of toxic fumes · Ingestion inhalation	· Increased marsh and shoreline erosion due to plant death/reduced stem density · Increased erosion changes sediment elevation and community structure (e.g. high marsh, low marsh)	· Behavioral changes and increased predation risk · Reduced growth · Long-term toxicity from oil retained in sediments · Genetic

State or Condition	Products	Density	Properties and Potential Release Behavior	General Types of Acute Physical and Chemical Impacts		Potential Persistent/Chronic Impacts	
				Plants	Animals	Plants	Animals
				necrosis and death due to toxicity of material	· Organ damage · Skin ulcerations	· Increased erosion changes sediment grain size and turbidity (e.g. suitability for eelgrass) · Plant death and physical disturbance changes dominant plant species and community structure	changes and reproductive impairment
	Bitumen	Specific gravity and API (highly variable)	Low evaporation and dissolution; Floats, submerges, and/or sinks depending on temperature, and specific gravity/AVI value of the particular oil shipment and type of diluent added; diluent typically volatile and acutely toxic	Similar mechanisms of effect as Bakken oil	Similar mechanisms of effect as Bakken oil	· Similar to Bakken in potential chronic mechanisms · Possible higher potential to penetrate into sediments · If sinks and binds to sediments, residue can persist	Similar mechanisms of effect as crude oil

State or Condition	Products	Density	Properties and Potential Release Behavior	General Types of Acute Physical and Chemical Impacts		Potential Persistent/Chronic Impacts	
				Plants	Animals	Plants	Animals
Plant-Based Fuels							
Pure (unblended)	Ethanol	Specific gravity 0.79; API 46-49	Float on water; generally readily metabolized by bacteria that break down fats and oils in the environment. Less acutely toxic that petroleum fuels and crude oils due to high proportion of plant-based oils.	· Physical smothering of leaves and soil (loss of photosynthesis and respiration) · Photosynthetic reduction and reduced carbohydrate storage in roots	· Smothering/drowning/suffocate/coat exposed gills of fish · Drowning due to lost buoyancy · Lost insulation and hypothermia · Less toxic to animals · High oxygen demand can reduce available oxygen in aquatic environments	Similar potential mechanisms as crude oil if large areas of plant mortality occur, but less toxicity and faster biodegradation	Similar mechanisms of effect as crude oil, but less toxicity and faster biodegradation
Can be composed of 20 - 80% of plant-based fuel	Renewable jet fuel	Specific gravity 0.76 - 0.82					
Can be composed of 20 - 80% of plant-based fuel	Renewable diesel	Specific gravity 0.86 - 0.90 ; API (variable)					
Variable composition	Used cooking oil/animal fat	Specific gravity - corn oil (0092), animal fat (0.92 - 0.94)					

Sources: BATTELLE 2007; California Environmental Protection Agency 2007; Edema 2012; Onwurah et al. 2007; Renewable Fuels Association 2003; U.S. Environmental Protection Agency 1999

4.7.1.4 Aesthetics

As discussed in Chapter 3, Section 3.9, *Aesthetics, Light, and Glare*, the aesthetic value of an area is based on the visual character and quality of its natural and human-made features. The aesthetic value of the study area varies from low to moderate visual quality at the project site (due to greater extent of industrial uses) to high visual quality in areas with fewer encroaching features (industrial facilities) and increased views of natural landscapes. The areas of high visual quality would be more susceptible to effects from spills.

A spill could degrade the visual quality of surrounding landscapes including both terrain and waterways. The degree of impact depends on factors including location of the spill, spill size, type of material spilled, weather and water current conditions, vegetation sensitivity, and effectiveness of spill response (containment and cleanup efforts). The greatest potential for impacts on the viewshed would involve a large spill of crude or other heavy oils in areas where the spill could be easily viewed from the land- and water-based vantages. The presence of this type of oil on the terrain and water would substantially alter the existing viewscapes, as described below.

A large spill of crude or other oils could negatively alter the viewshed by initially coating or covering topographical features in oil that can later result in broader ecological damage. The appearance of a large oil spill on natural landscapes is unsightly with thick oily sludge (a sticky, gooey, or tarry substance) enveloping widespread areas over relatively long periods. As noted above, ecological impacts related to vegetation could also occur from direct contact with oil that could result in smothering of leaves and soil and cause acute toxicity to plants. This would alter the existing visual landscape until vegetation regrew.

A large spill directly to water would have greater potential for extensive environmental exposure than a spill on land since oil could be transported via the waterway to a much wider geographic area. Visible effects of this type of spill can occur on the water surface, shorelines, beaches, and sensitive ecological areas including wetlands, marshes, and mudflats. The presence of crude or other heavy oils in the water could temporarily change the color and textural appearance of the water's surface to a brownish or blackish covering or sheen. Along the shorelines, beaches, wetlands, etc., dark oil slicks and sludges can accumulate over widespread areas resulting in a negative impression of the viewshed for relatively long periods.

Removal of oil and cleanup efforts on land and water is difficult and time-sensitive, and residual visual effects (e.g., leftover oil slicks or sheens, increased erosion from void of vegetation) may remain after cleanup operations. Additionally, the labor and equipment involved in cleanup itself could also affect the visual quality of the landscape.

Numerous measures and protocols are in place to prevent and minimize the extent of a spill once it occurs. These measures aimed at minimizing the frequency of a potential spill and the extent of the spill would reduce the potential for adverse impacts on aesthetics. However, no mitigation measures can be implemented that will completely eliminate the possibility of a large spill, nor are there any mitigation measures that will completely eliminate the adverse consequences of a large spill.

4.7.1.5 Recreation

As discussed in Chapter 3, Section 3.10, *Recreation*, a number of recreational resources (i.e., city and state parks and natural areas) offering a variety of recreational opportunities (e.g., fishing, birdwatching, boating, etc.) are available throughout the study area. Impacts from a spill would occur if the event results in conflicts with the existing recreational use or access to recreational areas. The degree of impact would be influenced by a number of factors (e.g., location of the spill, spill size, type of material spilled, topography, ecological sensitivity, effectiveness of spill response). The greatest potential for impacts on recreation resources could occur in the event of a large spill near a park or natural area, particularly in or near a waterway. Potential impacts on recreation in the event of a large spill are explained below.

A large oil spill could degrade the environment and preclude the use of recreational resources from the site of the release to throughout the extent of the spill. Affected recreational areas would be prohibited to the public during oil spill response and cleanup efforts until the affected areas are no longer impaired. Recreational activities could be restricted from the affected area for months, and in some cases years. In the case of the grounding of the *New Carissa*,[3] recreation radically declined as beaches and other recreational areas were closed for months resulting in an estimated 30,000 recreational trips reduction in the affected areas (U.S. Fish and Wildlife Service 2012).

In addition to the closure of recreational areas due to spill recovery efforts, other effects of an oil spill, such as impacts on natural resources, views, and wildlife, may conflict with the existing usage of the affected recreational area and deter recreational activities. In the case of the *Exxon Valdez* oil spill[4], recreation and tourism in the spill area dramatically declined as damage to natural resources limited access to hunting and fishing areas and beaches that harbored oil could not be visited. Recreational activities have increased since the spill; however, complete recreational use is still recovering as some beaches, localized areas, and natural resources are still impaired (Exxon Valdez Oil Spill Trustee Council 2015).

Recreational activities could be affected if the impacts of a large spill on aesthetic and wildlife resources disrupt recreational use associated with these resources. Regarding aesthetic resources, the study area includes several areas of high visual quality where many recreationalists visit to enjoy views of the natural landscapes and wildlife. If these resources are affected, activities could be discouraged due to the altered condition of the affected area from the spill's negative visual effect on the landscape. A large oil spill's impact on wildlife resources could also result in a decline of recreational activities. A majority of the study area's recreational activities are reliant on wildlife resources that provide opportunities to fish, shellfish, hunt, and watch wildlife. A large spill event could severely affect these resources, which could halt fishing, hunting, and wildlife viewing until fish and wildlife have recovered. In some cases, such as the *Exxon Valdez* oil spill, recovery of these resources could take years. Recreational attendance would return over time, and how quickly depends on the effectiveness of recovery efforts and period of impairment.

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[3] "On February 4, 1999, the 640-foot freighter *New Carissa* ran aground on the Oregon coast during a major winter storm. The vessel was carrying nearly 400,000 gallons of fuel oil and diesel onboard. After 4 days in the heavy surf, the *New Carissa* began leaking oil. On 11 February, the *New Carissa* broke in half, releasing an estimated 70,000-140,000 gallons of fuel into the marine environment" (U.S. Fish and Wildlife Service 2012).

[4] On March 24, 1989, the 986-foot vessel *Exxon Valdez* ran aground on Bligh Reef in Prince William Sound, Alaska spilling approximately 11 million gallons of crude oil that covered 1,300 miles of coastline and 11,000 square miles of ocean (Exxon Valdez Oil Spill Trustee Council 2015).

A subsequent effect on recreational resources resulting from limited use and access of affected recreational areas could include increased use of recreational areas in the study area that were not affected by the oil spill. Although there are numerous and large recreational areas provided in and around the study area, it should be noted that changes in recreational use in response to a spill could occur since areas that were not affected become more heavily used as activities are displaced from the affected areas.

As proven by past oil spill recovery and cleanup efforts (*Exxon Valdez* and *New Carissa*), removal of oil and cleanup efforts on land and water are difficult and can take months to years to complete. Additionally, the labor and equipment involved in cleanup itself could also affect the recovery period of natural resources.

Numerous measures and protocols are in place to prevent and minimize the extent of a spill once it occurs. These measures aimed at minimizing the frequency of a potential spill and the extent of the spill would reduce the potential for adverse impacts on recreation. However, no mitigation measures can be implemented that will completely eliminate the possibility of a large spill, nor are there any mitigation measures that will completely eliminate the adverse consequences of a large spill.

4.7.1.6 Cultural Resources

A spill could result in a variety of impacts to cultural resources in the study area. These impacts might include the fouling of historic resources (such as buildings and structures), oil seepage into soils containing archaeological sites, the contamination of historic landscapes or cultural significant properties, and the potential for secondary impacts caused by incident response or cleanup activities. The nature and duration of these impacts would depend on a variety of factors, including the type and quantity of material released, location of the release, and physical and biological features in the affected environment.

Oil that comes in contact with historic resources could potentially require the cleaning, repair, or replacement of features. The manner in which these activities were undertaken could adversely affect a historic resource by physically affecting those character-defining features that convey its historical significance.

Archaeological resources would likely not be directly affected by an oil spill but could be affected by any excavation or other ground disturbing activities that would occur because of cleanup or site remediation activities.

Historic landscapes or culturally significant properties could also be affected in this manner. In addition, the defining characteristics of a historic landscape or culturally significant property could be directly affected by an oil spill, causing physical damage or contaminating features or characteristics deemed significant. These features or characteristics could include vegetation or wildlife, the traditional use of a location, or aspects of the resource's location and setting.

Numerous measures and protocols are in place to prevent and minimize the extent of a spill once it occurs. These measures aimed at minimizing the frequency of a potential spill and the extent of the spill would reduce the potential for adverse impacts on cultural resources. However, no mitigation measures can be implemented that will completely eliminate the possibility of a large spill, nor are

there any mitigation measures that will completely eliminate the adverse consequences of a large spill.

4.7.1.7 Tribal Resources

As discussed in Chapter 3, Section 3.12, *Tribal Resources*, tribal resources include the traditional areas used for gathering of plants and fishing for economic, subsistence and ceremonial purposes. Traditional areas and the natural resources therein provide for spiritual and physical sustenance of tribal members. Treaty-reserved fishing and gathering rights provide a means for economic self-sufficiency and income (commercial harvest), dietary sustenance (subsistence harvest), and support cultural practices (ceremonial harvest).

Tribal fishing resources include the associated catch in fresh water, Grays Harbor, and ocean fisheries. Quinault Indian Nation members fish in Grays Harbor for salmon, steelhead, sturgeon, and Dungeness crab. Ocean fisheries adjacent to Grays Harbor are fished for Dungeness crab, halibut, sablefish, groundfish, ocean Chinook and coho salmon. Grays Harbor is home port for fishing vessels in ocean fisheries and is where fishers offload catch for these fisheries. The Quinault also manage razor clams for commercial and subsistence harvest on beaches on and off the reservation adjacent to Grays Harbor, and gather plant materials (such as sweetgrass and cattail stems) for production of woven materials. The Chehalis Tribe members harvest salmon and steelhead from the Chehalis River within the reservation boundaries and use tidal lands in Grays Harbor for shellfish harvest.

Potential impacts from a spill on plants in the study area including in shoreline habitats, the Chehalis River Surge Plain Natural Area, and Bowerman Basin are described in Section 4.7.1.2, *Plants*. Potential impacts of an oil spill on animals in the study area, including fish, shellfish, and invertebrates are described in Section 4.7.1.3, *Animals*.

A large-scale spill in Grays Harbor or the Chehalis River could affect the various species of tidal salt marsh plants that fringe the shoreline of Grays Harbor and the tidal surge plain wetland plant communities that characterize the Chehalis River Surge Plain Natural Area Preserve (Figure 3.4-2). Freshwater, Grays Harbor, and ocean fisheries could be affected. Constituent compounds in oil can be acutely toxic to animals resulting in mortality, reduced growth and vigor, or impaired reproduction and development (Sections 4.7.1.2, *Plants*, and 4.7.1.3, *Animals*).

The nature and duration of these impacts would depend on a variety of factors, including the type and quantity of the material released, location of the release (e.g., land or in water), the potential for ignition, physical and biological features of the affected environment, sensitivity of various species to pollution, and the form of the material that is released. In addition to the effects of exposure to released materials, organisms can also be damaged by physical and chemical aspects of spill response and cleanup efforts.

Numerous measures and protocols are in place to prevent and minimize the extent of a spill once it occurs. These measures aimed at minimizing the frequency of a potential spill and the extent of the spill would reduce the potential for adverse impacts on tribal resources. However, no mitigation measures can be implemented that will completely eliminate the possibility of a large spill, nor are there any mitigation measures that will completely eliminate the adverse consequences of a large spill.

4.7.1.8 Human Health

Similar to the potential impacts that could occur on the natural environment, spills of hazardous materials can adversely affect human health through increased exposure to hazardous air pollutants. In the event that a release occurred in a populated area, the following adverse impacts can occur. Inhalation of vapors resulting from exposure to a fresh release can cause irritation of the respiratory system. This can cause dizziness, rapid heart rate, headaches, confusion, nausea, and/or vomiting. Inhalation hazards from weathered materials are much less of a concern as the toxic volatile hydrocarbons are at much lower concentration following weathering. The toxicity of crude oil depends mainly on the volatility of the constituents: benzene, toluene, ethylbenzene, xylene, hydrogen sulfide, and polycyclic aromatic hydrocarbons. These constituents represent the most toxic of the components of crude oil. These are generally found in lower percentages than in refined petroleum products such as gasoline and diesel.

Bakken oil is generally considered a light "sweet" crude oil having a sulfur content of less than 0.3% by weight and a benzene content ranging from 0.1 to 1.0% by volume (Congressional Research Service 2014). Bitumen is a heavy crude oil. Fuel oils and lubricating oils are refined byproducts from the distillation of crude oil. The sulfur and benzene content of these products depends on the crude oil from which they are refined. Slightly more volatile distillates of crude oil are diesel and gas oil, followed by heating fuel oil and kerosene (jet fuel). Naptha is the next most volatile distillate, followed by gasoline, which is flammable at room temperature. The toxicity of gasoline is primarily a function of the benzene content, to a lesser extent the sulfur content, and to an even lesser extent toluene, ethylbenzene, and xylene content. Federal regulations require that by January 2017 gasoline not contain more than 10 ppm of sulfur on an annual basis. Gasoline sold today must have an annual average gasoline benzene content of 0.62 volume %.

The compounds with the potential for acute exposure health effects are hydrogen sulfide and benzene. Hydrogen sulfide is a colorless gas with a pungent, rotten egg odor smell. The odor threshold varies in individuals but is generally detectable by most people at 0.008 parts per million (ppm) (Amoore and Hautala, 1983). Starting at about 50 ppm, olfactory fatigue sets in and the odor is no longer detectible (Office of Environmental Health Hazard Assessment 2008). Human health risk from exposure to elevated levels of hydrogen sulfide depends on the concentration of the gas and length of exposure. Exposure at 10 ppm for more than 10 minutes causes eye and throat injuries, at 500 ppm for 3 to 5 minutes results in unconsciousness. A potential health risk is posed from the inhalation of high concentrations of hydrogen sulfide released into the air from an oil spill.

An oil spill trajectory and fate model assessed the potential exposure from a 10,000-barrel medium crude oil spill in typical southern waters (air 80°F and water 70ºF) under worst-case wind and current speeds (calm winds, 1 knot currents) (Thayer and Tell 1999). Results showed that modeled concentrations (well in excess of 10 ppm) could be immediately dangerous to workers due to respiratory paralysis. However, modeled hydrogen sulfide concentrations drop below toxic levels in less than 4 minutes. However, the volatility of hydrogen sulfide is temperature-dependent and would be released at rate about 20% lower (Yongsiri et al. 2004) and over a longer duration in the colder air and water temperatures found in Grays Harbor (Appendix D, *Air Data*). The maximum area affected was less than 400 meters from the spill. Thus, hydrogen sulfide concentrations are not expected to pose a health concern to first responders after a very short period. However, air monitoring should be conducted to determine the appropriate actions to take.

Benzene is a colorless liquid at room temperatures, with a slightly sweet smell. The odor threshold is 0.875 ppm (Haley 1977); at levels between 700 and 3,000 ppm, benzene can cause drowsiness, dizziness, rapid heart rate, headaches, tremors, confusion, and unconsciousness. Central nervous system symptoms of toxicity are apparent immediately after inhalation of high concentrations of benzene (3,000 ppm for 5 minutes). The Occupational Safety and Health Administration set a permissible exposure levels for workers at 1 ppm for 8-hour daily exposure. While benzene is less volatile than hydrogen sulfide, the release occurs over a longer period and may pose a risk of high concentrations of benzene released into the air from an oil spill.

The Thayer and Tell (1999) study also examined exposure to the potential concentration levels for benzene with a benzene content of 0.2% by weight. Results showed that the initial concentration can be well over 1 ppm but decreases rapidly within 1 hour and a distance of 350 meters from the spill. Over the course of 6 hours, the concentration dropped below 1 ppm everywhere, even under calm wind conditions. Again, dissipation would likely occur over a slightly longer duration in the Grays Harbor area because of colder air and water temperatures but benzene would be at lower concentrations. Thus, benzene concentrations are unlikely to pose a health concern to first responders, especially after 1 hour after the spill, unless there is a continuous spill of crude oil. However, air monitoring should be conducted to determine the appropriate actions to take.

Numerous measures and protocols are in place to prevent and minimize the extent of a spill once it occurs. These measures aimed at minimizing the frequency of a potential spill and the extent of the spill would reduce the potential for adverse impacts on human health. However, no mitigation measures can be implemented that will completely eliminate the possibility of a large spill, nor are there any mitigation measures that will completely eliminate the adverse consequences of a large spill.

4.7.2 What would be the environmental impacts of a fire or explosion?

The proposed action would result in the potential for more frequent spills of bulk liquids relative to the no-action alternative, although the risk of very large releases remains relatively low. A fire with or without an explosion could result from a spill, although the chance of a fire or explosion is lower than the overall chance of a spill. In general, a fire or explosion will only occur as the result of some, not all, oil spills. Heavier oils that would be handled at the project sites more commonly pool and do not generate many flammable vapors. Lighter materials, like diesel and gasoline, present a greater risk for a fire or explosion and are handled with precautions to prevent ignition. The potential risk of a fire or explosion resulting from a facility, train, or vessel spill is described in the following sections. The potential extent and the nature of the environmental damage can be quite varied. Because of these variables, the impacts of a fire or explosion on resource areas are described here in general terms.

4.7.2.1 Recent Fires and Explosions Involving Crude Oil Trains

Fires or explosions of crude oil are most likely to occur during transport when higher speeds provide enough energy to generate a spark. Recent incidents involving rail transport provide information about the potential impacts on human health related to incidents involving fires and in some cases, explosions. Typically, evacuations protect nearby residents from adverse health

impacts. Many of these incidents involved trains traveling at speeds greater than speeds allowed on the PS&P rail line (25 miles per hour) but are provide for information.

- On July 16, 2015, an incident involving at least three train cars were leaking crude oil after 21 cars derailed near Culbertson, Montana. There were no reports of injuries or fires although some residents were evacuated. An estimated 35,000 gallons (830 barrels) of oil were spilled.
- On May 6, 2015, a 109-car crude oil train derailed near Heimdal, North Dakota. Six cars exploded and an estimated 60,000 gallons (1,430 barrels) of oil spilled. Due to the resulting fire, 27 people were evacuated.
- On March 10, 2015, 21 cars of a 105-car-long crude oil train derailed about 3 miles outside of Galena, Illinois. No one was injured; however, several fires erupted lasting several days.
- On March 7, 2015, a crude oil train derailed about 3 miles outside of Gogama, Ontario. The resulting fire destroyed a bridge.
- On February 16, 2015, a crude oil train derailed and caught fire near Mount Carbon, West Virginia, leaking oil into the Kanawha River tributary and burning one home. The resulting fire lasted for almost one week and resulted in the evacuation of hundreds of families and the closure of two water treatment plants.
- On February 14, 2015, a 100-car train hauling crude oil and petroleum distillates derailed in a remote part of Ontario, Canada, causing a fire but no reported injuries.
- On January 20, 2014, seven cars derailed, with six containing Bakken oil on a bridge over the Schuylkill River in Philadelphia. No oil was spilled and no one was injured.
- On January 7th, 2014, an 8,400-foot freight train traveling at a speed of 47 miles per hour. Nineteen cars and one locomotive were derailed near Plaster Rock, New Brunswick. Of the 19 cars derailed, five were carrying crude oil, another five were carrying butane, and one was carrying ethanol. Other cars were not carrying hydrocarbons. The train had 122 cars, of which 66 were loaded and 56 were empty. About 60,900 gallons (1,450 barrels) of crude oil were spilled from two tank cars and caught fire, but without explosions. Approximately 150 residents were evacuated within a 1- mile radius. There were no injuries or deaths.
- On April 30, 2014, an incident occurred where 17 oil cars derailed. One car failed, leading to a fire. Three of the derailed cars ended up in the James River, spilling up to 30,000 gallons (714 barrels) of crude oil into the river. Later clarification noted that the fire involved a CPC-1232 rail car.
- On December 30, 2013, an accident involving a westbound grain train and an eastbound crude oil train occurred near Casselton, North Dakota.[5] Twenty tank cars carrying crude oil derailed when the crude oil train hit a derailed grain car going approximately 42 miles per hour. Eighteen of the tank cars were punctured spilling an estimated 400,000 gallons (9,520 barrels) of crude oil. The crude oil from the ruptured tank cars was ignited with multiple explosions. A voluntary evacuation of about 1,400 people followed the accident. No injuries or deaths were reported.

[5] The PS&P rail line is a single-track railroad and would not include risks associated with double-track railroads.

- November 7, 2013, an oil train traveling 38 miles per hour derailed near Aliceville, Alabama, resulting in 26 cars derailing and spilling approximately 749,000 gallons (17,830 barrels), contaminating some wetlands.
- On April 3, 2013 a freight train traveling at 35 miles per hour, near White River, Ontario experienced an emergency brake application, resulting in the derailment of 22 cars (19 loaded and three empty). Seven of the cars contained petroleum crude oil. During the derailment, a number of cars rolled down an embankment. Two of the crude oil tank cars released about 31,000 gallons (740 barrels) of crude oil and 4,800 gallons (114 barrels) of canola oil were spilled. A fire was reported, but no explosions. There were no injuries or deaths because of the accident.
- On July 6, 2013, in an accident in Lac-Mégantic, Quebec, a train transporting crude oil had a runaway tank car. The runaway car gained speed and derailed at 65 miles per hour in the town of Lac-Mégantic, Quebec. As a result, 47 people were killed and 40 buildings were damaged when 63 tank cars spilled approximately 1.6 million gallons (38,100 barrels) of crude oil and ignited.

4.7.2.2 Human Health

For a fire or explosion, evacuations could be used to protect nearby residents. Emergency responders would determine if evacuations are needed. In addition to potential direct damage from fires or explosions, when crude oil is burned it emits chemicals that affect human health. The primary air pollutants of concern are carbon monoxide, lead, nitrogen dioxide, particulate matter, sulfur dioxide, and polycyclic aromatic hydrocarbons. Inhalation of these byproducts can cause irritation of the respiratory system. This may harm the nose, air passages, and lungs by causing difficulty in breathing, coughing, and itching. Similar types of air pollutants would be found from the burning of refined crude oil distillates (gasoline, naptha, heating fuel, jet fuel, diesel).

Most information about the health impacts associated with burning crude oil come from peer-reviewed conference proceedings where the level of air pollutants are measured during a controlled burn using air monitoring equipment. Many studies have been conducted to identify what hazardous air pollutants are emitted when oil burns, mainly to assess if burning crude oil is a viable method for reducing the environmental impacts of an oil spill.

One of the most extensive studies was the Newfoundland Offshore Burn Experiment (Fingas et al. 1994, Campagna and Humphrey 1992, Fingas 2014, National Oceanic and Atmospheric Administration 1995), which found that particulate concentrations in the smoke plume remained the chief air pollutant of concern with levels remaining above background more than a mile or two downwind of the incident. The smoke emitted from burning oil contains gases and particulates that may have toxic effects on human health, much like exhaust emissions from motor vehicles or smoke from wood stoves (National Oceanic and Atmospheric Administration 1995). The actual health risks depend on the actual exposure (concentration level and the duration of exposure) to the air contaminant. In most cases, exposure to smoke particulate would occur when the smoke plume occurs relatively close to the ground level.

Particulates in the smoke plume are considered by most health professionals to be the main combustion product to investigate and monitor (National Oceanic and Atmospheric Administration 1995). During burning, elemental carbon (soot) and hydrocarbons are emitted and since these

particulates absorb light to a high degree, the smoke plume from crude oil burning is usually black. The most recent compendium of results (Fingas 2014) has further expanded the compounds assessed and the concentration levels observed based on additional experiments. These studies continue to support the finding that particulate matter remains the pollutant of chief concern, but would not be expected to exceed levels of public health concern within 1,000 yards of the fire unless a strong temperature inversion was present at the time of the incident.

While the majority of the burned oil would be converted to carbon dioxide and water, particulates, mostly soot, typically comprise 10 to 15% of the emissions. In addition, small amounts of polynuclear aromatic hydrocarbons are emitted from the fire, mostly as residues attached to the particulates. Some polynuclear aromatic hydrocarbons are known or suspected carcinogens. Exposure of the skin (from chronic skin contact with oils) or the lungs from inhalation of these chemicals can be harmful. Based on data from the Newfoundland Offshore Burn Experiment, most polynuclear aromatic hydrocarbons are burned in the fire, and their concentration in the oil residue is higher than in the air emissions (Fingas et al. 1994).

In other studies that examined air impacts of burns that occurred over longer time periods, concentrations of polynuclear aromatic hydrocarbons were found to be barely detectable in air emissions (Campagna and Humphrey 1992). Low levels have also been detected in experimental oil burns (Fingas et al. 1994).

Numerous measures and protocols are in place to prevent and minimize the extent of a spill once it occurs. These measures aimed at minimizing the frequency of a potential spill and the extent of the spill would reduce the potential for a fire or explosion and adverse impacts on human health. However, no mitigation measures can be implemented that will completely eliminate the possibility of a large spill or fire or explosion, nor are there any mitigation measures that will completely eliminate the adverse consequences of a large spill, fire, or explosion.

4.7.2.3 Plants

Impacts of a fire or explosion would depend on the conditions as well as the characteristics of the vegetation species and communities exposed. The likelihood of a plant being killed by fire depends on a combination of time and temperature. High, sustained temperatures are most likely to result in plant mortality, especially when several different parts of the plant have been injured. The aboveground portions of herbaceous plants, shrubs, and trees are the most likely to be destroyed. Trees may survive as long as the fire does not spread into the canopy. However, trees that survive the fire may later succumb to disease, fungus, or insects due to their decreased resistance caused by injuries sustained in the fire. Belowground roots and rhizomes may survive depending on the intensity, duration, and extent of the fire and its effect on the soil. The effect of fire on soil is related to the amount of heat transferred into the ground due to the severity of the fire.

High intensity fire can sterilize the soil and delay vegetation recovery, affecting community structure and function. Reduced vegetation cover after a fire can accelerate soil erosion and sedimentation.

Numerous measures and protocols are in place to prevent and minimize the extent of a spill once it occurs. These measures aimed at minimizing the frequency of a potential spill and the extent of the spill would reduce the potential for a fire or explosion and adverse impacts on plants. However, no mitigation measures can be implemented that will completely eliminate the possibility of a large

spill, fire, or explosion, nor are there any mitigation measures that will completely eliminate the adverse consequences of a large spill, fire, or explosion.

4.7.2.4 Animals

Animals' immediate responses to fire are influenced by intensity, severity, rate of spread, uniformity, and size of the fire. Responses may include injury, mortality, immigration, or emigration. Animals with limited mobility, such as young, are more vulnerable to injury and mortality than mature animals. Many animal-fire studies depict a reorganization of animal communities in response to fire, with increases in some species accompanied by decreases in others.

Numerous measures and protocols are in place to prevent and minimize the extent of a spill once it occurs. These measures aimed at minimizing the frequency of a potential spill and the extent of the spill would reduce the potential for explosion and adverse impacts on animals. However, no mitigation measures can be implemented that will completely eliminate the possibility of a large spill, fire, or explosion, nor are there any mitigation measures that will completely eliminate the adverse consequences of a large spill, fire, or explosion.

4.7.2.5 Aesthetics

A fire or explosion from an oil spill could substantially degrade the visual quality of surrounding landscapes. The degree of impact is contingent on the size and location of the fire or explosion with the greatest potential for impacts on the viewshed in areas where the effects could be easily viewed from the land- and water-based vantages. Visual effects of a fire or explosion can include areas with extensive burn damage to structures, facilities, property, or natural features such as forests, vegetation, wildlife habitats. This type of physical damage would substantially alter and degrade the visual quality of the study area's existing viewsheds until the landscape is restored.

Numerous measures and protocols are in place to prevent and minimize the extent of a spill once it occurs. These measures aimed at minimizing the frequency of a potential spill and the extent of the spill would reduce the potential for a fire or explosion and adverse impacts on aesthetics. However, no mitigation measures can be implemented that will completely eliminate the possibility of a large spill, fire, or explosion, nor are there any mitigation measures that will completely eliminate the adverse consequences of a large spill, fire, or explosion.

4.7.2.6 Recreation

A fire or explosion from an oil spill could substantially degrade the environment and preclude the use of recreational resources in affected areas. The degree of impact would be influenced by the location and magnitude of the fire or explosion. The greatest potential for impacts would occur if the fire or explosion was within or close to a recreational facility (e.g., boating facilities, campgrounds, trails, etc.), park, or natural area. Impacts on recreational resources would include the destruction or physical damage by the fire or explosion to the resource itself. Recreational visitation and activities would dramatically decline if recreational resources such as viewsheds and wildlife resources were substantially damaged by fire or explosion. Visitation could also be reduced as access to recreational sites could be destroyed or interrupted during fire related closures. Some areas could be affected by the presence of fire camps during suppression of the fire or explosion.

A subsequent impact on recreational resources resulting from limited use and access of affected recreational areas could be increased use of recreational areas in the study area that were not affected by the fire or explosion. Although there are numerous and large recreational areas in and around the study area, changes in recreational use in response to a fire or explosion could occur since areas that were not affected become more heavily used as activities are displaced from the affected areas.

Numerous measures and protocols are in place to prevent and minimize the extent of a spill once it occurs. These measures aimed at minimizing the frequency of a potential spill and the extent of the spill would reduce the potential for a fire or explosion and adverse impacts on recreation. However, no mitigation measures can be implemented that will completely eliminate the possibility of a large spill, fire, or explosion, nor are there any mitigation measures that will completely eliminate the adverse consequences of a large spill, fire, or explosion.

4.7.2.7 Cultural Resources

A fire or explosion from an oil spill could result in the partial or complete destruction of historic resources and cultural significant properties adjacent to or near the study area. The severity of the impacts would depend on the proximity of such resources to the study area, the extent and severity of the fire or explosion, and measures taken during the incident response and cleanup activities. Such events would not be expected to affect archaeological resources unless the fire, explosion, incident response, or cleanup activities resulted in the disturbance or excavation of soils within or near an archaeological site.

Numerous measures and protocols are in place to prevent and minimize the extent of a spill once it occurs. These measures aimed at minimizing the frequency of a potential spill and the extent of the spill would reduce the potential for a fire or explosion and adverse impacts on cultural resources. However, no mitigation measures can be implemented that will completely eliminate the possibility of a large spill, fire, or explosion, nor are there any mitigation measures that will completely eliminate the adverse consequences of a large spill, fire, or explosion.

4.7.2.8 Tribal Resources

An explosion or fire from a spill could affect tribal resources such as plants and animals, as described above. It could also result in the exclusion of tribal members from traditional areas during incident response. The duration of these impacts would depend on the severity of the fire and duration of the incident response and cleanup activities.

Numerous measures and protocols are in place to prevent and minimize the extent of a spill once it occurs. These measures aimed at minimizing the frequency of a potential spill and the extent of the spill would reduce the potential for a fire or explosion and adverse impacts on tribal resources. However, no mitigation measures can be implemented that will completely eliminate the possibility of a large spill, fire, or explosion, nor are there any mitigation measures that will completely eliminate the adverse consequences of a large spill, fire, or explosion.

Chapter 5
Extended Rail and Vessel Transport

Under the proposed action, oil and hazardous material[1] would be transported to and from the project site primarily by rail and vessel, respectively. Chapter 3, *Affected Environment, Impacts, and Mitigation*, describes impacts of rail transport along the Puget Sound & Pacific Railroad (PS&P) rail line between Centralia, Washington, and the project site as well as vessel transport from the project site. This chapter examines impacts of rail transport along mainline routes beyond Centralia and vessel transport along commercial vessel routes off the Washington Coast, including Puget Sound.

This chapter describes rail and vessel transportation in the extended study area, impacts under the no-action alternative and proposed action, and any applicable mitigation measures.

Detailed information about the transport of crude oil by rail and vessel in Washington State can be found in the *Washington State 2014 Marine and Rail Oil Transportation Study* (Washington State Department of Ecology 2014, 2015).

5.1 What is the extended study area for rail and vessel transport?

The rail traffic extended study area encompasses the BNSF Railway Company (BNSF) main line from Centralia (the eastern endpoint of the PS&P rail line) to the Bakken formation in North Dakota. This route is considered because Bakken crude oil is expected to be the most likely source of crude oil handled by the applicant. Crude oil from other locations, including Canada, and other bulk liquids, could be brought to the facility by rail as part of the proposed action; however, the same rail routes in Washington State would likely be used.

The vessel traffic extended study area includes likely commercial vessel routes for bulk liquid transport between Grays Harbor and the final point of delivery. Because U.S. crude oil is not currently exported, transportation routes for U.S. crude oil are limited to routes that access other U.S. ports along the West Coast, including Puget Sound. Therefore, the extended study area for vessel traffic includes the West Coast of the United States. Bulk liquids other than U.S. crude oil may be exported to domestic and foreign ports as part of the proposed action; however, the same vessel routes off the coast of Washington State would likely be used.

[1] The following additional bulk liquids are part of the proposed action: ethanol, naphtha, gasoline, vacuum gas oil, jet fuel, no. 2 fuel oil, no. 6 fuel oil, kerosene, renewable jet fuel, renewable diesel, used cooking oil, and animal fat.

5.2 What laws and regulations apply to rail and vessel transport?

Applicable regulations for rail and vessel traffic are described in Sections 3.15, *Rail Traffic*, and Section 3.17, *Vessel Traffic*, respectively. Additional regulations relevant to rail and vehicle safety and oil spill contingency planning are presented in Chapter 4, *Environmental Health and Safety*.

5.3 How were the impacts on rail and vessel transport in the extended study area evaluated?

5.3.1 Information Sources

The following recently prepared agency studies provided a foundation for the extended study area analysis.

- *Washington State 2014 Marine & Rail Oil Transportation Study* (Washington State Department of Ecology 2014, 2015)
- *Washington State Freight Mobility Plan* (Washington State Department of Transportation 2014a)
- *Washington State Rail Plan, Integrated Freight and Passenger Rail Plan, 2013-2015* (Washington State Department of Transportation 2014b)
- *West Coast Offshore Vessel Traffic Risk Management Project Final Project Report and Recommendations* (Pacific States/British Columbia Oil Spill Task Force 2002)

5.3.2 Impact Analysis

This impact analysis addresses the potential for increased rail and vessel traffic related to the proposed action to result in environmental impacts in the extended study area. In general, this analysis considers that potential impacts along the BNSF main line are likely similar to those that would occur along the PS&P rail line and that the magnitude of impacts would be roughly proportional to the incremental increase in traffic under the proposed action. Potential impacts from ocean vessel traffic on water and air are also likely to be similar to those that would occur in the Grays Harbor area.

Therefore, impacts that were determined to be low as addressed in Chapter 3, *Affected Environment, Impacts, and Mitigation*, and Chapter 4, *Environmental Health and Safety*, were also anticipated to be low in the extended study area. Impacts that would occur only in the study area, such as related to navigation in the Grays Harbor Navigation Channel, were not included in this analysis. The following resource areas are not considered further in this analysis.

- Earth
- Water
- Plants
- Energy and Natural Resources

- Land and Shoreline Use
- Aesthetics, Light, and Glare
- Recreation
- Cultural and Historic Preservation
- Public Health and Safety
- Rail Traffic
- Vessel Traffic

The analysis of impacts in the extended study area focuses on the following resource areas.

- Air (rail)
- Animals (vessel)
- Noise and Vibration (rail)
- Tribal Resources (vessel)
- Vehicle Traffic and Safety (rail)
- Environmental Health and Safety (rail and vessel)

Sections 5.5.2.1, *Rail Transportation*, and 5.5.2.2, *Vessel Transportation*, characterize the relative increases in rail and vessel traffic within the extended study area. Then, the potential indirect impacts of increased rail and vessel traffic related to the proposed action are qualitatively assessed in the context of baseline (i.e., no-action alternative) rail and vessel traffic in the extended study area.

5.4 What rail and vessel transport occurs in the extended study area?

This section describes rail and vessel transportation along routes that would likely be used under the proposed action to transport oil and hazardous materials in the extended study area. This section provides a summary of recent changes in North American crude oil reserves and the modes of transporting crude oil in the United States. It then focuses on rail transport along mainline routes between the Bakken formation and Centralia, Washington, and vessel transport off the coast.

5.4.1 U.S. Crude Oil Production and Modes of Transport

U.S. crude oil reserves are estimated at more than 36 billion barrels (U.S. Energy Administration 2013). Over the last decade, crude oil production in the U.S. has increased by 60% (U.S. Energy Administration 2015). This increase can be attributed primarily to the extraction of shale oil in Texas and crude oil from the Bakken formation in North Dakota.

North Dakota crude oil extraction increased more than 11 times between 2003 and 2013—from 3.4 to 37.8 million gallons per day (Washington State Department of Ecology 2015). During this same period, production of diluted bitumen from oil sands in Alberta and Saskatchewan increased 2.5 times, from 36.2 to 73.5 million gallons per day (Washington State Department of Ecology 2015).

This increased production—both crude oil and diluted bitumen—has led to increased shipments of these oils to refineries in Washington State, California, Illinois, Texas, Louisiana, and New Jersey via rail and vessel.

The number of crude oil-containing rail tank cars in the United States has increased nearly 44 times in the last 6 years—from 9,500 carloads in 2008 to 415,000 carloads in 2013 (Washington State Department of Ecology 2015). In 2013, approximately 12.7 billion gallons of oil were transported by rail in the United States. By the end of 2014, an estimated, 19.5 billion gallons of crude oil were transported by rail.

5.4.2 Current Pacific Northwest Oil Movement

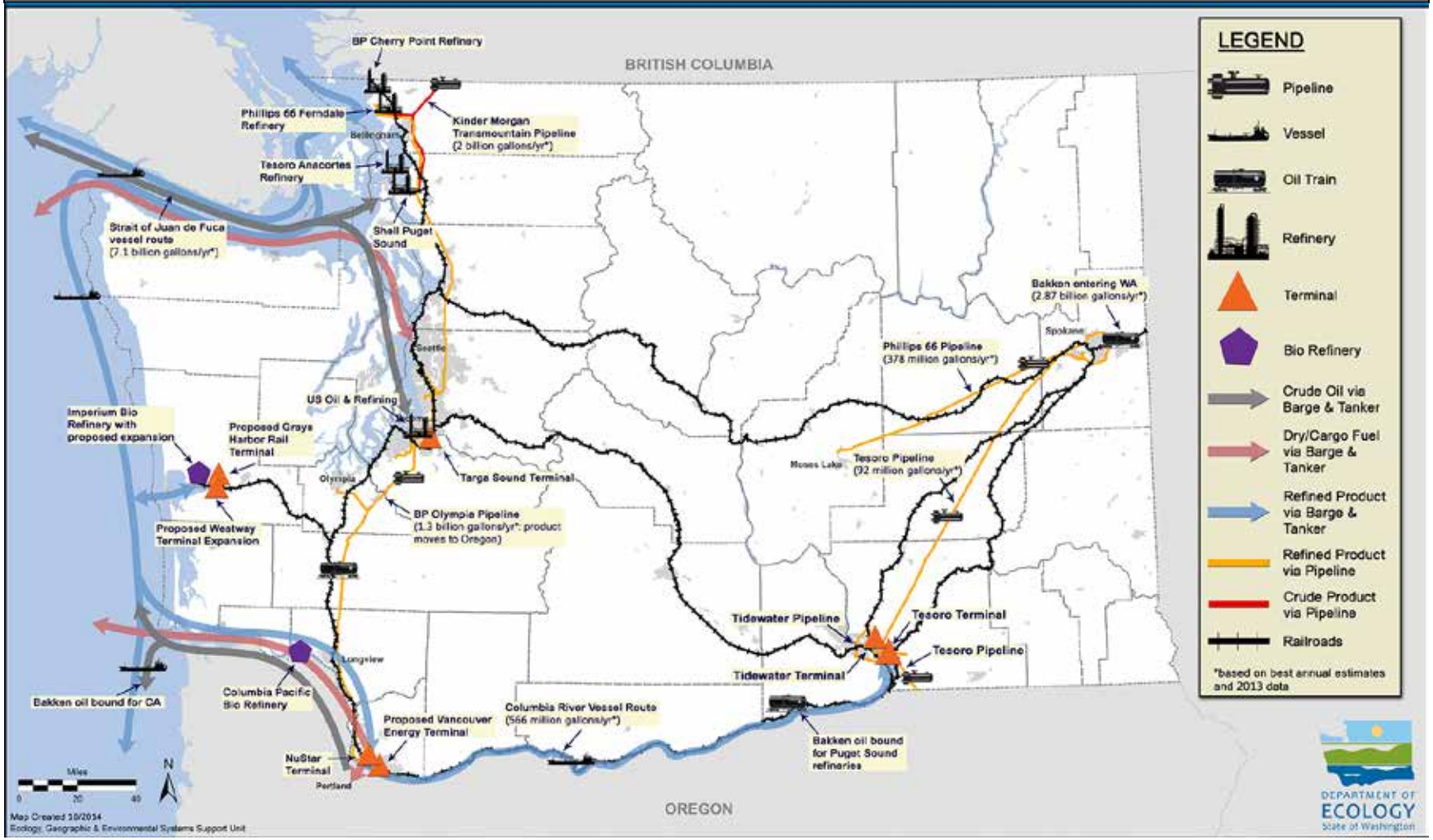
Multiple sources of crude oil have been transported into Washington State over the years. Because the capacity of Washington's refineries has not substantially changed over the last decade, the amount of crude oil transported into the state has been steady at about 8.5 billion gallons annually. However, imports of crude oil have shifted from tanker delivery primarily from Alaska to delivery by pipeline, and more recently by rail tank car (Figure 5-1).

Washington State oil refineries exported about 2.6 billion gallons of refined products in 2011, an increase of 17% from 2008. In addition, in 2011, 487.2 million gallons of bunker (i.e., vessel) fuel were loaded onto tank vessels and exported from Washington State refineries (Washington State Department of Ecology 2015).

Oil, including diluted bitumen, from Canada is transported by pipeline to refineries in northern Puget Sound. Puget Sound refineries transfer refined products to the Olympic Pipeline, to tank vessels and trucks for transport. Diluted bitumen and Bakken crude oil are also currently being transported by rail through Spokane to a facility on the Columbia River and refineries in Puget Sound. Most crude oil shipped by rail in Washington is currently going through the Columbia River Gorge, but could transit over other rail routes.

Nineteen loaded crude oil unit trains pass through Washington State weekly, or approximately 988 per year, destined either for the storage facilities and refineries described above, or for facilities in Oregon and California. Additionally, crude oil tank cars are transported on mixed commodity unit trains carry; data on these tank car movements are unknown. Table 5-1 and Figure 5-2 illustrate how the mode of crude oil transport to Washington State has changed from 2003 to 2013.

Figure 5-1. Movement of Oil In and Out of Washington State



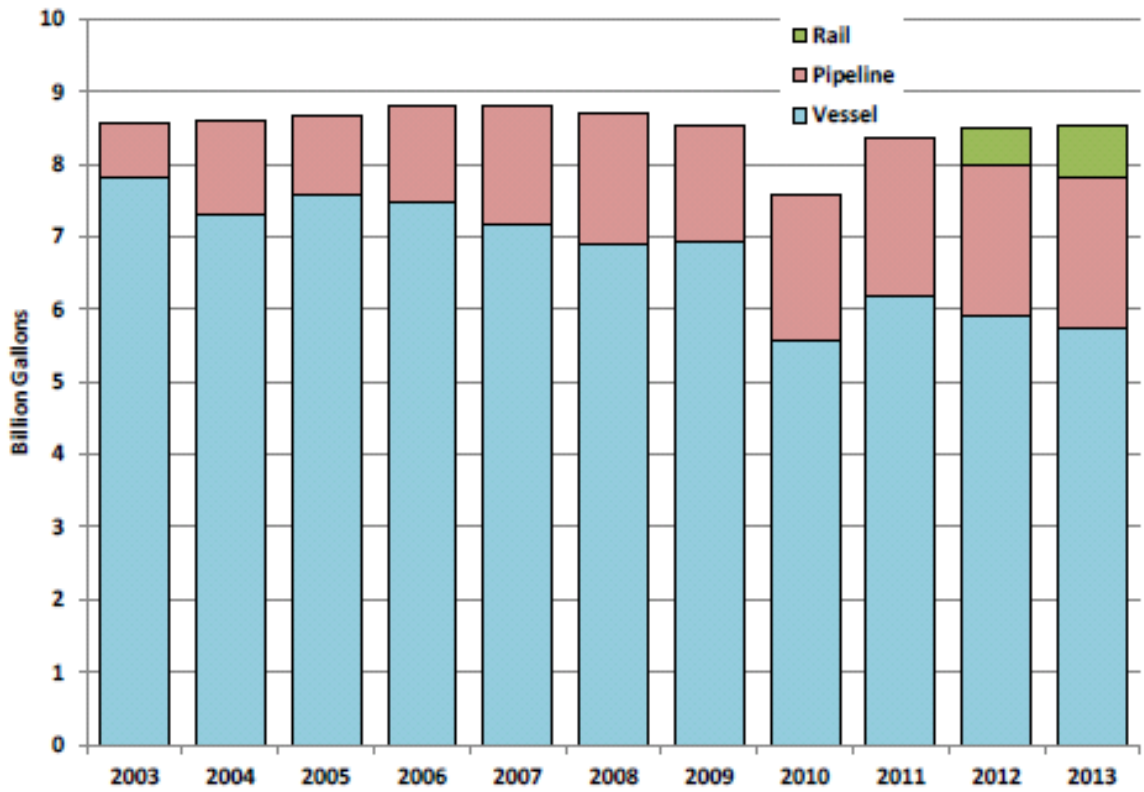
Source: Washington State Department of Ecology 2015

Table 5-1. Estimated Annual Oil Imports by Mode of Transportation into Washington State

	Billion Gallons				Total (%)		
Year	Vessel	Pipeline	Rail	Total	Vessel	Pipeline	Rail
2003	7.8030	0.7753	0.0000	8.5783	91.0	9.0	0.0
2004	7.3171	1.2929	0.0000	8.6100	85.0	15.0	0.0
2005	7.5884	1.0919	0.0000	8.6803	87.4	12.6	0.0
2006	7.4826	1.3079	0.0000	8.7905	85.1	14.9	0.0
2007	7.1744	1.6338	0.0000	8.8083	81.5	18.5	0.0
2008	6.9090	1.7784	0.0000	8.6875	79.5	20.5	0.0
2009	6.9398	1.5992	0.0000	8.5390	81.3	18.7	0.0
2010	5.5713	2.0129	0.0000	7.5842	73.5	26.5	0.0
2011	6.1756	2.1769	0.0000	8.3525	73.9	26.1	0.0
2012	5.9210	2.0756	0.5092	8.5057	69.6	24.4	6.0
2013	5.7480	2.0652	0.7128	8.5260	67.4	24.2	8.4
Total	**74.6302**	**17.8100**	**1.2220**	**93.6621**	**79.7**	**19.0**	**1.3**

Source: Washington State Department of Ecology 2015:32

Figure 5-2. Crude Oil Imports into Washington State by Mode (2003–2013)



Source: Washington State Department of Ecology 2015

5.4.3 Freight Rail Corridors

5.4.3.1 Williston Basin and Bakken Crude Oil Rail Transport

The U.S. crude oil anticipated to be received by the applicant would come from the Bakken region also generally referred to as the Williston Basin. BNSF serves 10 originating terminals in the Williston Basin and connects to 16 of the top 19 oil-producing counties in central and western North Dakota, and five of the six oil-producing counties in eastern Montana. BNSF transports more than half of the oil produced in the North Dakota and Montana regions of the Bakken formation.

In 2008, when the Bakken boom was beginning, BNSF transported just a few thousand barrels a day. Between 2008 and 2012, the volume transported by BNSF increased nearly 7,000% (Bowen 2012). By 2013, BNSF was transporting about 700,000 barrels of crude oil per day, with 550,000 to 600,000 of those barrels originating in the Bakken formation (Stagle 2014). Production in the Bakken formation—where BNSF handles 75% of the output—is expected to grow from 1.2 to 2 million barrels per day (Stagl 2014).

BNSF has stated plans to accommodate growing demands for oil and freight transit with capital investments in infrastructure, equipment, and rolling stock enhancements. In 2012, BNSF invested $197 million on projects in North Dakota and Montana such as 2,188 miles of track surfacing, 121 miles of rail replacements, and about 332,000 rail ties, as well as signal upgrades and equipment acquisitions. In addition, BNSF constructed two 8,000-foot inspection tracks near Minot, North Dakota, which is a switching yard where cars are routed to their end locations, and an inspection station. In 2013, BNSF budgeted $4.3 billion for capital expenditures, including about $250 million on capacity enhancements and infrastructure work in North Dakota and the Bakken region. In 2014, BNSF identified almost $500 million of proposed infrastructure improvements on the northern tier of its network—primarily in North Dakota, Montana and Washington—to address capacity needs for handling more crude oil and agricultural products traffic. Figure 5-3 shows the BNSF networks transporting Bakken crude oil.

Figure 5-3. Originating Crude Oil by Rail Terminals

5.4.3.2 BNSF Main Lines

Between Williston Basin and Washington State

The most northerly BNSF route (linking Chicago and Minneapolis with Spokane, Seattle, and Portland) is used to transport various commodities, including Bakken crude oil from North Dakota to the Pacific Northwest. Continuing from Sandpoint, Idaho, the BNSF main line travels through Montana to Williston, North Dakota. Montana communities along this line include Whitefish, East and West Glacier Park, Havre, and Glasgow.

The BNSF main line from Spokane connects with the Kootenai River Subdivision, which runs to Sandpoint, Idaho. This section of track is commonly known as the Funnel—it is the second-busiest rail corridor in Washington. The 69-mile line hosts an average of 46 freight trains each day, along with daily operation of Amtrak's Empire Builder service connecting Seattle and Portland to Chicago. Sandpoint also is the western end of the Montana Rail Link system, which has operating rights over BNSF into Spokane. As the corridor experienced substantial growth in recent years, BNSF began to increase capacity by adding a second main track. As of April 2005, only 20 miles remained under single-track operation. Annual freight traffic consists of intermodal, forest, and agricultural products, coal, chemicals, and finished automobiles.

Washington State

Washington State is served by two Class 1[2] railroads: BNSF and the Union Pacific Railroad (UP) (Figure 5-1). Except for two small segments of UP-owned track, UP operates in Washington State on BNSF tracks. Crude oil is currently transported along the BNSF main lines. UP does not transport crude oil by rail in Washington State (Washington State Department of Ecology 2015).

BNSF operates more than 1,604 miles of rail line in Washington, which represents almost 10% of their total system. It is the largest rail operator in Washington, handling 1.367 million carloads in 2011 (Washington State Department of Transportation 2014b:37).

Within Washington State, BNSF has four main freight routes (Figure 5-4).

- **Stevens Pass**. Stevens Pass, the most northerly route, runs through or near Spokane, Ephrata, Wenatchee, Leavenworth, and Everett, where it connects to the BNSF north-south main line. Amtrak also uses this route for destinations in the eastern United States and Seattle or Portland.
- **Stampede Pass**. Stampede Pass, the middle route, runs through or near Spokane, Yakima, and Auburn, where it connects with the BNSF north-south main line.
- **Columbia River Gorge**. Columbia River Gorge, the most southerly route, runs through or near Spokane, Pasco, and communities along the north shore of the Columbia River, including Vancouver, Washington, where it connects with the BNSF north-south main line.
- **North-south main line.** The north-south main line roughly parallels the Interstate 5 corridor and extends from Vancouver, Washington, to the Canadian border. The route passes through or near Kelso, Centralia, Olympia, Tacoma, Seattle, Edmonds, Everett, Mount Vernon, and Bellingham. Amtrak uses this route for a number of passenger rail trains. In the Puget Sound area, Sound Transit's Sounder commuter rail also travels along this main line.

Each of these main line routes is part of the BNSF's Northwest Division, which consists of various subdivisions (Table 5-2).

[2] Class I railroads have annual revenue exceeding $453 million and account for 69% of the industry's mileage, 90% of its employees, and 94% of its freight revenue. They operate in 44 states and the District of Columbia and concentrate largely on long-haul, high-density intercity traffic (Association of American Railroads 2014).

Figure 5-4. BNSF Main Line Routes in Washington State

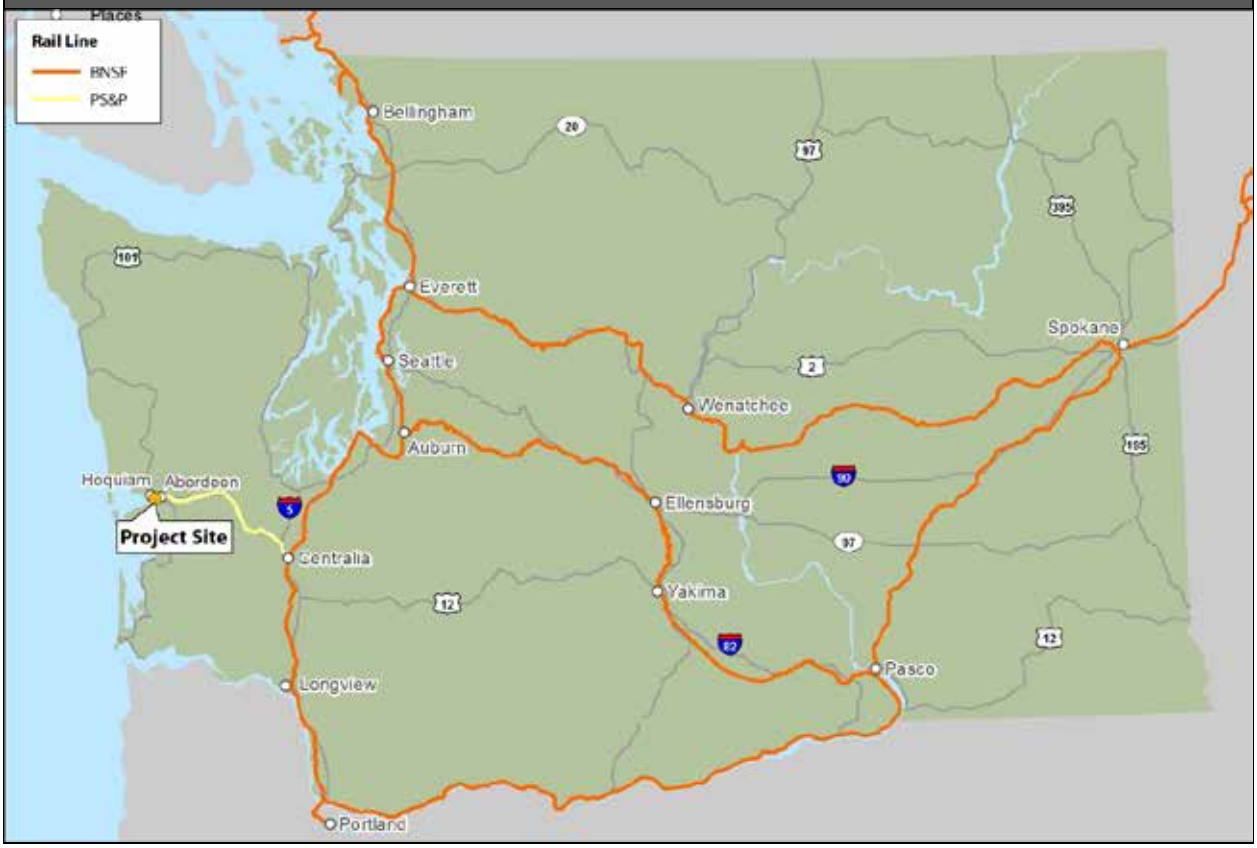


Table 5-2. BNSF Northwest Division—Subdivisions in Washington State

Main Line Route	Subdivision	Begin-End Point	Primary Cities along the Route
Stevens Pass	Scenic	Everett to Wenatchee	Everett, Monroe, Gold Bar, Skykomish, Leavenworth, Wenatchee
	Columbia River	Wenatchee to Spokane	Wenatchee, Quincy, Spokane
Stampede Pass	Stampede	Auburn to Ellensburg	Auburn, Easton, Cle Elum, Ellensburg
	Yakima Valley	Ellensburg to Pasco (connects with Lakeside Subdivision to from Pasco to Spokane)	Ellensburg, Yakima, Kennewick, Pasco
Columbia River Gorge	Fallbridge	Vancouver to Pasco	Vancouver, Camas, Wishram, Pasco
	Lakeside	Pasco to Spokane	Pasco, Ritzville, Cheney, Spokane
North-South	Bellingham	U.S./Canada Border to Everett	Everett, Marysville, Burlington, Bellingham, Blaine
	Scenic	Everett to Seattle	Everett, Mukilteo, Edmonds, Seattle,
	Seattle (connects with Fallbridge Subdivision)	Seattle to Vancouver	Seattle, Tukwila, Auburn, Tacoma, Olympia, Centralia, Winlock, Kelso, Vancouver

Track Conditions, Classes, Control Systems, and Speeds

The BNSF main line routes are located in diverse geographic and topographic corridors that contribute to their physical layout. The routes also vary with respect to operating characteristics, as summarized below.

- **Track class.** The Federal Railway Administration sets track classes from 1 to 9 based on the quality of the track. Track class determines speed limits and maximum train car weight. It also determines whether the rail line can accommodate passenger trains. The BNSF main line routes in Washington State are maintained at Class 4 specifications.
- **Control system.** The train control system ensures safety by managing rail traffic through signaling systems.
- **Speed.** The Federal Railway Administration sets the speed limit based on track class, although some large communities may establish permanent speed restrictions. While unloaded unit bulk trains can operate at maximum track speed, all trains over 100 tons per operative brakes—including unit trains carrying crude oil—are restricted to a maximum speed of 45 miles per hour (mph)[3]. Lesser volumes of oil and hazardous materials, however, may be transported in manifest trains,[4] which frequently do not exceed 100 tons per operating brakes and can operate at the maximum speed allowed for class track and freight trains.

The U.S. Department of Transportation Pipeline And Hazardous Materials Safety Administration's final rule on Hazardous Materials: Enhanced Tank Car Standards and Operational Controls for High-Hazard Flammable Trains (May 2015) places several restrictions and requirements on the high-hazard flammable unit trains[5] that would be operating on the main line in Washington State under the proposed action. These controls relate to speed restrictions, braking systems, and routing, as follows.

- **Speed.** All trains that include 20 or more tank cars carrying a Class 3 flammable liquid in a continuous block or 35 such tank cars throughout the entire train are designated as high-hazard flammable trains and are restricted to 50 mph in all areas. If such trains include tank cars that do not meet the new enhanced standards, they are restricted to 40 mph in high-threat urban areas. Portland, Vancouver, and a 10-mile buffer extending from the border of the combined area plus Seattle, Bellevue, and a 10-mile buffer extending from the border of that combined area are the only high-threat urban areas in the extended study area (49 Code of Federal Regulations [CFR] 1580, Appendix A).
- **Braking.** High-hazard flammable trains must have a functioning two-way end-of-train device or a distributed power braking system in place. In addition, high-hazard flammable unit trains must be operated with an electronically controlled pneumatic braking system. This system must be implemented by January 1, 2021, if the train is transporting one or more tank cars loaded

[3] Exceedence is determined by the total weight of the train (cars and commodity without the weight of the locomotives) divided by the number of cars in the train with operable brakes.
[4] BNSF defines a manifest train as a scheduled merchandise freight train. Manifest trains are typically composed of loaded and empty boxcars, gondolas, individual tank cars, auto cars, etc.
[5] A high-hazard flammable unit train is one that travels at speeds greater than 30 mph and includes 70 or more tank cars loaded with Class 3 flammable liquids. Crude oil and ethanol are Class 3 flammable liquids.

with a Packing Group I flammable liquid and by May 1, 2023, if it is transporting one or more tank cars loaded with a Packing Group II or III flammable liquid.[6]

- **Routing.** Railroads must select their route based on a routing analysis that addresses at least 27 specified safety and security factors. They must also provide an appropriate point of contact to state and/or regional fusion centers and other state, local, and tribal officials who contact the railroad to discuss routing decisions. This will be in addition to the requirements to notify State Emergency Response Commissions set forth in a May 2014 Emergency Order, per a recent clarification from the U.S. Department of Transportation.

The topographic and operational characteristics of each route are summarized below; explanations and definitions about rail track elements can be found in Appendix K, *Rail Technical Information*.

Stevens Pass

This 331-mile corridor consists of BNSF's Scenic Subdivision (Seattle-Everett-Wenatchee) and Columbia River Subdivision (Wenatchee-Spokane). The line traverses the longest railroad tunnel in the United States, the 7.8-mile Cascade Tunnel under the summit of Stevens Pass. The portion of the line between Seattle and Everett is mostly double track, and the majority of the Everett-Spokane segment is single track.

With only a few exceptions, rail traffic is controlled entirely by a dispatcher managed Centralized Traffic Control.[7] Maximum passenger train speed is 79 mph, maximum freight train speed is 60 mph between Wenatchee and Spokane and 50 mph between Seattle and Wenatchee.

Stampede Pass

The BNSF's 227-mile main line across central Washington consists of the Stampede Subdivision between Auburn and Ellensburg and the Yakima Valley Subdivision connecting Ellensburg and Pasco. The Stampede Subdivision crosses the Cascade Mountains at Stampede Pass, entering the height-restricted Stampede Tunnel at the summit. The Yakima Valley Subdivision traverses the twisting Yakima River Canyon, which limits train speed and capacity. The corridor is almost all single track, except for a short stretch of two main tracks at Easton.

Rail traffic is controlled with Track Warrant Control,[8] with a dispatcher managed Centralized Traffic Control used only at sidings. Maximum permitted train speed is 49 mph.

Columbia River Gorge

The 233-mile Columbia River Gorge route consists of the BNSF Fallbridge Subdivision, which connects Vancouver, Washington, with Pasco, where main lines continue to Seattle and Spokane. The line closely follows the Columbia River for its entire length, connecting with the Oregon Trunk Subdivision (BNSF's sole connection between the Pacific Northwest and California) at Wishram. The line is essentially level, with a maximum grade of 0.20%. The Fallbridge Subdivision is almost all single track, with short stretches of double track around Portland and Wishram. East of Pasco, the 149-mile BNSF Lakeside Subdivision connects Pasco and Spokane, and its eastern 12-mile track

[6] The packing groups set requirements based on the degree of danger presented by the material (I: high, II; medium, or III: low), which reflects the boiling point and flashpoint for the material carried.
[7] With Centralized Traffic Control, train movement is authorized by signals remotely provided by a train dispatcher.
[8] With Track Warrant Control, dispatchers issue permission for trains to proceed instead of using signals.

hosts UP trains operating between Hinkle, Oregon, and Spokane. The corridor is primarily single track, with short stretches of double track near Spokane, Beatrice, and Pasco.

Between Vancouver and Pasco, rail traffic is controlled over the entire line by a dispatcher managed Centralized Traffic Control. Maximum passenger train speed is 79 mph and freight train speed is 60 mph; the maximum allowable railcar weight is 143 tons. East of Pasco, except for a short segment of Automatic Block Signaling[9] at Pasco, the entire line is controlled by a dispatcher managed Centralized Traffic Control. Maximum passenger train speed is 79 mph and freight train speed is 60 mph.

North-South Main Line

The BNSF's 177-mile Seattle Subdivision, the north-south main line that connects Seattle with Portland, is the most heavily trafficked rail line in Washington State. The entire corridor is double track. The double track continues north between Seattle and Everett on the Scenic Subdivision. From Everett to New Westminster, British Columbia, this 152-mile corridor is single track, and then becomes double track from New Westminster to Vancouver, British Columbia.

Between Vancouver, Washington, and Everett, rail traffic is controlled by a dispatcher managed Centralized Traffic Control, with the exception of short stretches in the Tacoma and Seattle areas. Maximum passenger train speed is 79 mph and freight train speed is 60 mph. From Everett to New Westminster, British Columbia, rail traffic is controlled by a dispatcher managed Centralized Traffic Control, with the exception of Automated Block Signaling/Occupancy Control System[10] in a few short stretches. Maximum train speeds vary between 60 mph to 79 mph for both passenger and freight rail.

Maintenance and Inspections

Ongoing track maintenance is a standard practice for railroads. Crews continually monitor track condition and maintain or upgrade ties, rail, and ballast, as necessary. This maintenance program relies upon continual inspection of the track and grade crossings.

Track Inspection

As required by federal law, key corridors on BNSF are inspected four times a week, and many heavily traveled routes are inspected daily. The BNSF inspectors review the conditions of tracks and right-of-way as well as whistle posts, crossbucks, and active warning devices. In addition, BNSF train crews are instructed to report any signal and crossing warning malfunctions immediately to BNSF's Network Operations Center in Fort Worth (BNSF Railway Company 2013).

Grade Crossings

BNSF is responsible for maintenance of active warning devices. Each active warning device is inspected monthly by BNSF. This inspection includes a review of functionality of gates and lights and of battery back-up power sources (BNSF Railway Company 2013).

[9] With Automatic Block Signaling, signals are activated by trains in a consecutive series of blocks along the track.

[10] The Occupancy Control System is one of three control systems; the other two are Track Warrant Control and Direct Traffic Control.

Wayside Detector System

A nationwide wayside detector system helps prevent damage and accidents by monitoring the condition of passing trains. Located along 140,000 miles of railroad, wayside detectors monitor the wheels of passing trains and alert rail car operators to potential defects, enabling them to schedule appropriate maintenance in a safe, timely, and cost-effective manner.

The BNSF Railway Northwest Division Timetable No. 4 (BNSF Railway Company 2009) identifies wayside detectors at multiple locations on its primary mainline corridors in Washington State. The detectors include dragging equipment detection, rail car journal integrity exception reporting, wheel impact detectors, and slide fence detectors. Table 5-3 lists the locations of these detectors.

Table 5-3. Location of Wayside Detectors by Subdivision

Main Line	Route	Mileposts (MP)	Route Miles	Number of Wayside Detectors	Average Miles between Detectors
Columbia River Gorge	Sandpoint, ID to Spokane, WA	MP3.0–MP71.5	68.5	14	4.89
	Spokane to Pasco	MP1.1–MP147.5	146.4	28	5.23
	Pasco to Vancouver, WA	MP229.7–MP9.9	219.8	28	7.85
North-South	Vancouver, WA to Seattle	MP136.5–MP0.3	136.2	12	11.35
	Seattle to Everett	MP0.0–MP32.2	32.2	4	8.05
	Everett to Blaine	MP0.0–MP119.3	119.3	9	13.26
Stevens Pass	Everett to Wenatchee	MP1784.7–MP1650.2	134.5	22	6.11
	Wenatchee to Spokane	MP1650.2–MP1481.6	168.6	11	15.33
Stampede Pass	Auburn to Ellensburg	MP0.0–MP102.6	102.6	18	5.7
	Ellensburg to Pasco	MP1.9–MP127.0	125.1	12	10.43

Source: Washington State Department of Ecology 2015

5.4.3.3 Main Line Freight Rail Traffic

Washington State

In addition to currently transporting crude oil into Washington State, the BNSF main lines deliver products to locations throughout Washington. Amtrak and Sound Transit (in Puget Sound) also operate passenger rail service along portions of the main lines. Table 5-4 provides a summary of freight and passenger traffic by route.

Table 5-4. Existing Daily Rail Traffic along the BNSF Main Lines in Washington State

Main Line	Route	Average Number of Freight Trains	Number of Passenger Trains	Freight Train Products
North-South	Vancouver, BC to Everett	23 (with only 12 running through to BC)	4 Amtrak Cascades	Intermodal, forest and agricultural products, refuse, chemicals, and finished automobiles.
Stevens Pass	Everett to Spokane	25	1 Amtrak Empire Builder	Intermodal, agricultural and forest products, chemicals, automobiles, and other merchandise between the Northwest and the Midwest.
	Everett to Seattle	50	4 Amtrak Cascades 8 Sounder 1 Amtrak Empire Builder	
North-South	Seattle to Portland	58	8 Cascades 18 Sounder 1 Amtrak Coast Starlight	Intermodal, forest and agricultural products, refuse, chemicals, and finished automobiles.
Columbia River Gorge	Portland to Pasco	31	1 Amtrak Empire Builder	Intermodal, forest, and agricultural products, refuse, coal, chemicals and finished automobiles.
	Pasco to Spokane	33 (BNSF) 11 (UP)		
Stampede Pass	Auburn to Pasco	6		Forest, agricultural, and chemical products.

Source: Washington State Department of Transportation 2014b: Appendix 3-B

Mainline Capacity and Utilization

The Washington State Department of Transportation (WSDOT) State Rail Plan shows the BNSF main line in Washington State has adequate capacity to meet its current demands (Figure 5-5) (Washington State Department of Transportation 2014b). Rail capacity is different from rail traffic. Rail traffic is the number of trains that actually use the rail line (typically presented by segment or subdivision). Rail capacity is the maximum number of trains that can be operated along the rail line while safely operating trains within a realistic schedule.

The corridor with the most rail traffic is BNSF's Spokane to Pasco segment, which operates at 87% of capacity (Washington State Department of Transportation 2014b). BNSF's Portland-Vancouver, Washington to Pasco Subdivision follows at 71% of line capacity. Since 2012, BNSF's directional running[11] of empty bulk trains on the Stampede Pass route (Auburn-Pasco via Yakima) has enhanced rail capacity—by almost 300%—from about 10 trains per day to 39 trains per day on this route. At present, this Stampede Pass route handles approximately four to six trains per day. Figure 5-5 illustrates rail traffic and utilization[12] along each main line (as of 2010). Figure 5-6 projects the same information for year 2035. The projections for 2035 do not include rail growth related to crude oil trains. Future projections and utilization are based on analyses performed as part of

[11] Directional running refers to running trains in opposite directions on a double track.
[12] Utilization is defined as the ratio of demand to available capacity.

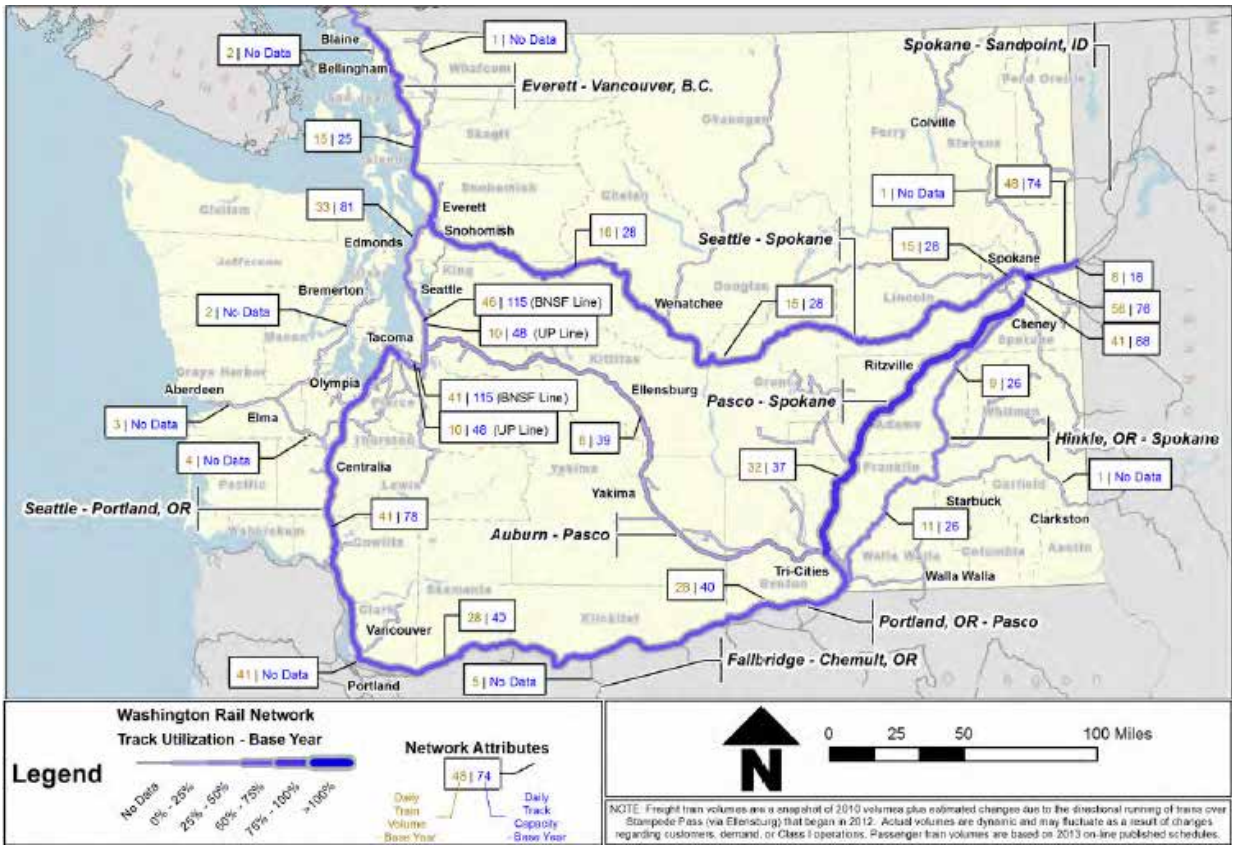
Washington State Rail Plan (Washington State Department of Ecology 2015). That analysis presents an estimate of future rail traffic and utilization.

Washington's rail system is expected to handle more than 260 million tons of cargo by 2035 — more than double the volume carried on the system in 2010. This represents a compound annual growth rate of 3.4% for commodities carried on the rail system but does not include increased rail traffic related to crude oil or coal proposals. Rail traffic in Washington associated with crude oil is discussed further in Section 5.4.1, *No-Action Alternative*. Several rail segments are expected to require operational changes and/or capital improvements to manage anticipated freight rail volumes under the 2035 projection.

This analysis of the BNSF lines suggests the following conditions by 2035.

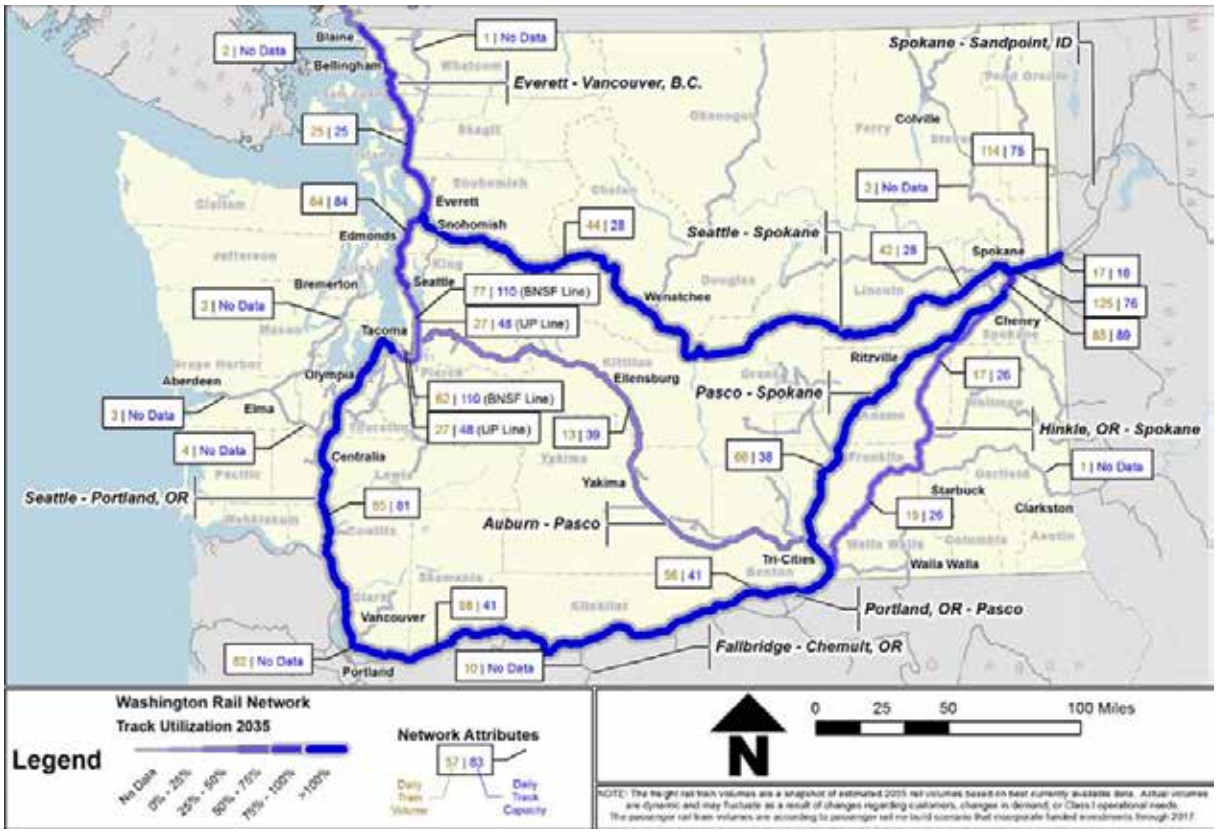
- Pasco-Spokane at 170% utilization.
- Seattle-Spokane via Wenatchee at 150% utilization.
- Spokane-Hauser Junction, Idaho at 150% utilization.
- Vancouver-Pasco at 140% utilization.
- Seattle-Portland and Everett-Burlington are projected to be near the 100% utilization mark.

Figure 5-5. BNSF Main Line Daily Traffic and Utilization —2010



Source: Washington State Department of Transportation 2014b:41

Figure 5-6. BNSF Main Line Daily Traffic and Utilization—2035



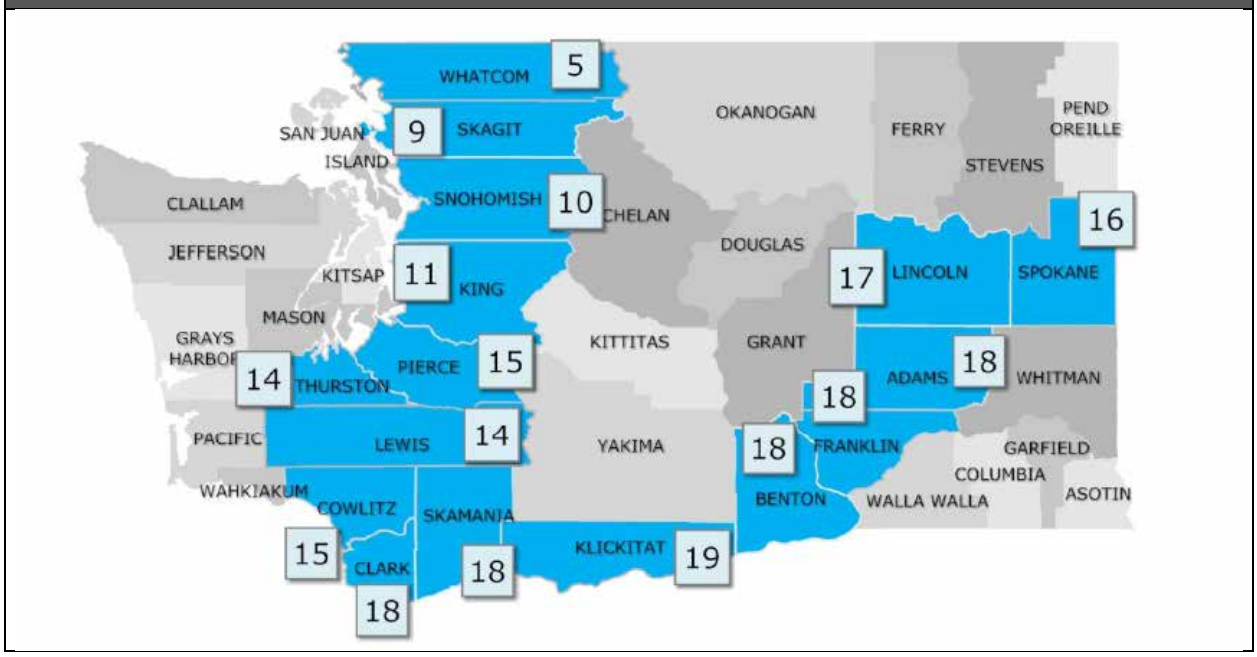
Source: Washington State Department of Transportation 2014b:41

Crude Oil Unit Bulk Train Routes

BNSF has not specified a route for crude oil unit trains in Washington State. BNSF has stated that routes will be determined based on operational needs and may vary. Most trains enter and leave Washington State over the BNSF corridor between Sandpoint and Spokane. In some cases, a few trains arrive and/or leave on UP routes from Oregon and California.

Currently, BNSF directs westbound loaded unit bulk trains, including crude oil, from Spokane to Vancouver, Washington on the Columbia River Gorge route. In Vancouver, the unit trains are switched to the north-south main line and travel north to Puget Sound and beyond. BNSF directs eastbound empty trains on the Stevens Pass and the Columbia River Gorge routes, depending on capacity. A growing number of eastbound empty unit bulk trains operate over Stampede Pass. Figure 5-7 illustrates the location and number of loaded crude oil by rail trains that currently travel through Washington State.

Figure 5-7. Current Weekly Loaded Crude Oil by Rail in Washington Counties (June 2014)



Source: Washington State Department of Ecology 2015

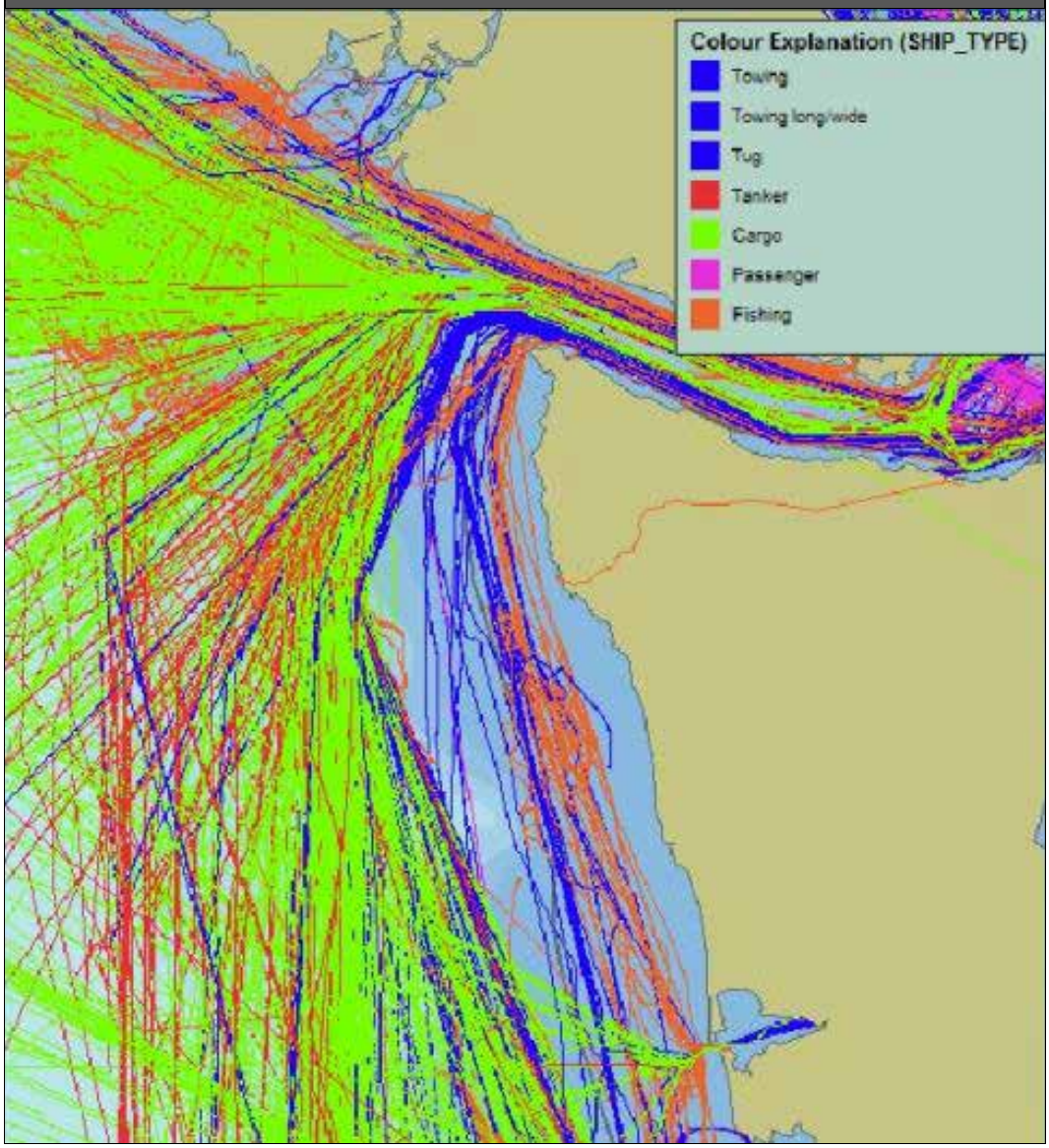
5.4.4 Vessel Routes and Destinations

Vessel routes vary based on destinations but follow typical vessel routes off Washington's coast and in Puget Sound, as discussed in this section. Vessels transporting oil/bulk liquids as part of the proposed action are not expected to transit the Columbia River. Under recommendations from the Pacific States/British Columbia Oil Spill Task Force, loaded tank vessels typically transit along routes 50 nautical miles from the coast and freight vessels transit 25 nautical miles from the coast.

In 2014, 6,815 cargo ships and tankers[13] entered Grays Harbor, the Columbia River and Grays Harbor and there were 4,175 tank barge transits (Washington State Department of Ecology 2015:343). Vessels are tracked using automated identification systems required on all large commercial vessels. The Marine Exchange of Puget Sound tracks vessels in Puget Sound, Grays Harbor, and off the Washington coast for 150 miles. The Merchants Exchange of Portland tracks vessels in the Lower Columbia River and off the Washington and Oregon coasts. An example of the transits of large commercial ships tracked along the Olympic Peninsula coast of Washington are shown on Figure 5-8.

[13] *Vessels* used to transport bulk liquids, such as crude oil, are referred to as tank vessels and include *tankers* (self-propelled ships) and *tank barges* (barges propelled by tugs). Vessel traffic in the navigation channel also includes *cargo vessels* (comprising ships and barges) carrying grain, automobiles, and wood or other products. Tank vessels and cargo vessels are referred to collectively in this document as *large commercial vessels*.

Figure 5-8. Vessel Traffic along the Olympic Peninsula Coastline—December 2012–January 2013



5.4.4.1 Vessel Arrivals and Departures for Grays Harbor

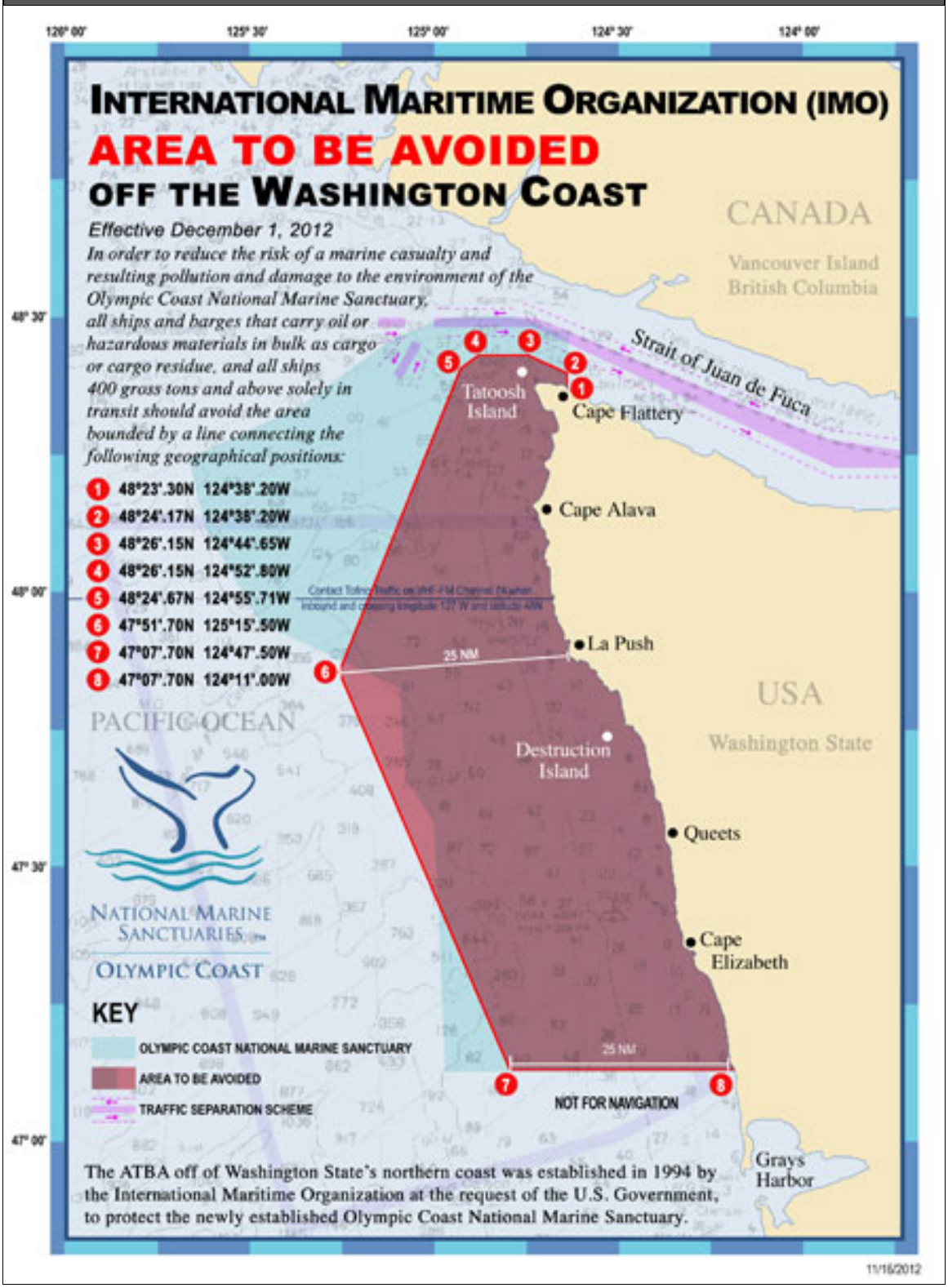
In 2012, 157,663 vessels called at the principal ports along the west coast in Washington, Oregon, and California. In 2012, 140 vessels called at the Port of Grays Harbor (Port), which accounts for less than 0.1% of total vessels transiting off the coast. When entering or departing Grays Harbor, whether heading to another U.S. port (a coastwise voyage) or a foreign port, a freight vessel is likely to travel seaward to 25 to 50 nautical miles from the coast and transit along the coast. Under recommendations from the Pacific States/British Columbia Oil Spill Task Force, loaded tank vessels typically transit along routes 50 nautical miles from the coast and freight vessels transit 25 nautical miles from the coast.

5.4.4.2 Olympic Coast National Marine Sanctuary

The Olympic Coast National Marine Sanctuary comprises approximately 2,408 square nautical miles of coastal and ocean waters and the submerged lands off the central and northern coast of Washington State. The sanctuary, which is connected to both the Big Eddy Ecosystem and the California Current Large Marine Ecosystem, is one of North America's most productive marine regions and undeveloped shorelines. The northern edge of the sanctuary begins just north of Cape Flattery, Washington, and the southern boundary is located approximately 12 nautical miles north of the entrance to Grays Harbor (Figure 5-9).

The sanctuary includes an area designated an *Area to Be Avoided* by the International Maritime Organization in 1994 at the request of the U.S. government. The designation is intended to protect the sanctuary by limiting vessel transits off the coast of Washington to reduce the risk of marine casualties such as oil spills, and the resulting environmental damage to the sanctuary. The designation applies to all ships 400 gross tons and greater and to any ships and barges that carry oil or hazardous materials as cargo or if the tanks contain residual oil. Complying with the Area to Be Avoided is voluntary but in 2012, the compliance rate for all vessels over 400 gross tons was 98% (National Oceanic and Atmospheric Administration 2013).

Figure 5-9. Areas to Be Avoided off the Washington Coast



Source: National Oceanic and Atmospheric Administration 2013

5.4.4.3 Puget Sound

Description

The Strait of Juan de Fuca, accessible from the Pacific Ocean, and its approaches provide access to Port Angeles, Puget Sound, and the San Juan Island Archipelago. To the north and connected by Haro Strait and Boundary Pass is the Strait of Georgia. Deep-draft vessels entering the Strait of Juan de Fuca use the harbors at Port Angeles, Anacortes, Seattle, Tacoma, Olympia, and Bellingham, Washington, and Vancouver, British Columbia. The Strait of Juan de Fuca separates the south shore of Vancouver Island, Canada, from the north coast of Washington State. Commerce in this region is extensive. Vessels entering the Strait of Juan de Fuca for commerce may be foreign-flagged or U.S.-flagged. Typical vessel approaches are along major vessel routes.

The Strait of Juan de Fuca is about 11 miles wide for approximately 50 miles to Race Rocks and then widens to about 16 miles for 30 miles east to Whidbey Island, its eastern boundary (National Oceanic and Atmospheric Administration 2015). The waters are typically deep until near the shore with few outlying dangers, most of which are in the eastern part. The navigation of these waters is relatively simple in clear weather. In thick weather, because of strong and irregular currents, extreme caution and vigilance must be exercised.

Vessel Traffic

Large commercial vessels operating in Puget Sound typically call at ports in Port Angeles, Seattle, Tacoma, Olympia, or Vancouver, British Columbia. The Puget Sound area has a vessel traffic service system under the command of U.S. Coast Guard to facilitate safe and efficient transit of vessel traffic and prevent collisions or groundings. This system conducts real-time reporting, monitoring, and management of vessel traffic and anchorage usage and provides instant information and advice 24 hours a day as needed. It also enforces navigation rules and special safety and security restrictions. It may adjust certain rules or restrictions for safety reasons.

An International Maritime Organization-approved traffic separation scheme governs vessel traffic in Puget Sound and its approaches. This area is actively managed by a joint U.S.–Canadian Cooperative Vessel Traffic Service. The separation scheme consists of five sets of traffic lanes: the western approach and the southwestern approach from the ocean; the western lanes in the Strait; the southern lanes to Port Angeles; the northern lanes to Victoria, British Columbia; and two precautionary areas, one west-northwest of Cape Flattery and the other north of Port Angeles. Each set of lanes consists of inbound and outbound traffic lanes with separation zones (National Oceanic and Atmospheric Administration 2015). Tank vessels are not required to meet the Rosario Strait one-way traffic rules in 33 CFR 161.55. Tug vessels are monitored by the U.S.–Canadian Cooperative Vessel Traffic Service during transit though Rosario Strait and Puget Sound.

Tankers over 125,000 deadweight tons[14] bound for a U.S. port are prohibited from operating in Puget Sound (33 CFR 165.1303). All oil tankers (as defined in 33 CFR 168) and vessels of 40,000 deadweight tons or more must have tug escorts (Revised Code of Washington [RCW] 88.16.190). All escorts must be nearby to ensure timely and effective response, taking into consideration the sea and weather conditions, ship characteristics, and nearby traffic.

[14] *Deadweight ton* refers to the ship's weight-bearing capacity: it is the sum of all cargo, provisions, and crew, but not the weight of the ship itself.

The Puget Sound Harbor Safety Committee has implemented a harbor safety plan with standards of care for bunkering (fueling), anchoring, and actions for incidents, towing vessels, and tanker escorts.

5.4.4.4 Emergency Response Towing Vessel

To help protect Washington's shorelines and waterways, the Washington State maritime industry has permanently stationed an emergency response towing vessel in Neah Bay. The tug is an important safety net to prevent disabled ships and barges from grounding off Washington's outer coast or in the western Strait of Juan de Fuca. Tank vessels transiting to or from a Washington port through the Strait of Juan de Fuca (except for transits extending no further west than Race Rocks Light) must include the emergency response towing vessel stationed at Neah Bay in their oil spill contingency plans (RCW 88.46.130).

5.5 What are the potential impacts on rail and vessel transport in the extended study area?

This section describes the impacts on rail and vessel traffic that could occur in the extended study area. Impacts that could occur under the no-action alternative are described first as a baseline for comparing the potential impacts of the proposed action.

5.5.1 No-Action Alternative

Under the no-action alternative, the applicant would continue to operate its existing facility as described in Chapter 2, Section 2.1.2.2, *Existing Operations.* Although the proposed action would not occur, it is assumed that growth in the extended study area would continue under the no-action alternative within the 20-year analysis period (2017 to 2037). Such development could result in in impacts characterized in subsections 5.5.1.1, *Rail Transportation*, and Section 5.5.1.2, *Vessel Transportation*.

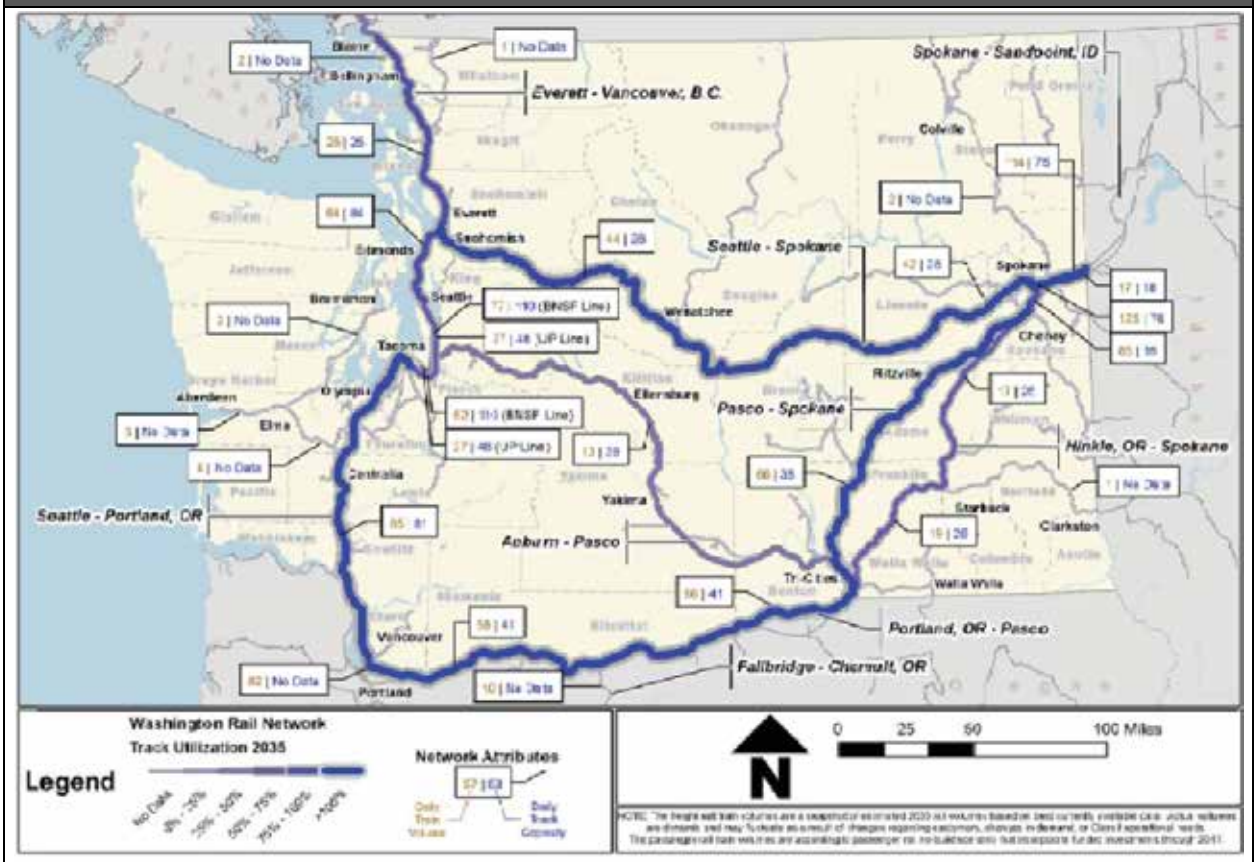
5.5.1.1 Rail Transport

Future demand and growth in Washington and beyond will depend on market forces. Future growth and rail capacity have been analyzed by WSDOT, and the results from some of these analyses are included in this discussion. The existing and proposed facilities identified below could increase rail traffic in the extended study area in the future. These facilities are not part of the detailed study area described in Chapters 3, 4, 6, or 7 of this document.

Impacts on BNSF Main Lines in Washington State

Washington's rail system is expected to handle more than 260 million tons of cargo by 2035—more than double the volume carried on the system in 2010 (Washington State Department of Transportation 2014b). This represents a compounded annual growth rate of 3.4% for commodities carried on the BNSF main lines. Under the no-action alternative, rail traffic on the BNSF main line routes is expected to increase as presented in Figure 5-10.

Figure 5-10. BNSF Main Line Future Growth and Capacity (2035)



Sources: BNSF 2010 Train Counts Data for Washington; UP 2012 Q1 Train Counts Data for Spokane-Eastport, Idaho corridor; Cambridge Systematics' Estimation of growth factors between 2010 and 2035 for Train Volumes using a TransCAD Model of ORNL's Rail Network; and Capacity Analysis using the 2011 BNSF Northwest Division timetable data, 2011 BNSF R 1 report data and Washington Rail Plan GIS data.
Note: Reflects directional running of trains on the Stampede Pass route (Auburn-Pasco via Yakima), which was implemented by BNSF in 2012.

Source: Washington State Department of Transportation 2014b

The WSDOT State Rail Plan states it did not include crude oil movement by rail or coal export terminal proposals in Washington State for the 2035 projection. The Millennium Bulk Terminals – Longview coal export proposal includes an estimate of 16 train trips a day (Millennium Bulk Terminals—Longview 2013). The Gateway Pacific Terminal coal and bulk export proposal includes an estimate of 18 train trips a day (Pacific International Terminals 2012).

Table 5-5 uses information from the Marine & Rail Oil Transportation Study for an overview of proposed and operating facilities moving crude oil by rail, including refineries and terminals outside of the Grays Harbor Study area, which are discussed in Chapter 6, *Cumulative Impacts* (Washington State Department of Ecology 2015).

Table 5-5. Proposed and Operating Facilities Moving Crude Oil by Rail

Owner or Proponent	Location	Daily Trains (Empty and loaded)
BP Refinery	Cherry Point	2
NuStar Terminal	Vancouver	0.6
Phillips66 Refinery	Ferndale	1
Shell Refinery	Anacortes	2
Targa Sound Terminal	Tacoma	2
Tesoro Refinery	Anacortes	2
U.S. Oil Refinery	Tacoma	1
Vancouver Energy Terminal	Vancouver	8

Planned Capacity Enhancements

To address future growth and capacity on the BNSF main lines, four projects are currently in the construction or detailed planning phase, with completion for each ranging from 2012 through the 2018 (Washington State Department of Transportation 2014b). Improvements include the completion of a third main line between Martin's Bluff and Rocky Point and a new siding near Kalama, which will be necessary to accommodate projected passenger train volumes. These improvements are currently in the environmental review process.

The Blakeslee Junction project would improve access/egress efficiency between the Interstate 5 corridor main lines, and both the PS&P rail line and Tacoma rail line at Centralia. Growth in the number of unit trains moving to and from the Port via the PS&P rail line has increased congestion at the interchange. This project includes a number of elements designed to increase the speed of trains through the interchange with the PS&P rail line. This will benefit both freight and passenger trains. The project is divided into five phases. Early planning has been completed on the project, but only partial funding for Phase 1A and 1B are available. Construction will require additional funding.

Recommended port access projects include a unit train staging yard near Woodland, which would increase the efficiency of both the BNSF and UP routes through the Columbia River Gorge and the Interstate 5 corridor. BNSF currently stages unit grain trains in Pasco for movement to export terminals on the lower Columbia River, Puget Sound, and Grays Harbor. The distance between the Pasco staging yard and the export terminals increases the potential for train delays. A staging yard in Woodland would reduce the distance to the export terminals. This project would also benefit passenger trains by reducing conflicts with slower-moving freight trains. This project is currently in the discussion phase.

Impacts on Rail Network Capacity in Washington State from Future Non-Crude Oil by Rail Transport

Under the no-action alternative, the applicant would continue rail operations consistent with current operations as described in Section 2.1.2.2, Existing Operations. Based on rail traffic projections discussed in Section 3.15, *Rail Traffic*, it is anticipated that rail traffic bound for the existing facility at the project site would not substantially increase by 2017 or 2037 compared to overall Washington State rail traffic. WSDOT projections of rail capacity in Washington in 2035 (Figure 5-10) identify areas where existing rail capacity is expected to be exceeded. Additional rail traffic not included in the rail study could also affect rail capacity. The potential impacts will depend

on actions taken by the railroad to address capacity but are not dependent on the proposed action. Under the no-action alternative, potential impacts on the BNSF rail network could occur.

Indirect Impacts on Other Resources from Increased Rail Traffic in Washington State

Under the no-action alternative, the applicant would continue rail operations consistent with current operations as described in Section 2.1.2.2, Existing Operations. Rail traffic growth along the BNSF main lines in Washington State under the no-action alternative could have incremental impacts on the natural and human environment in the extended study area. Impacts associated with routine rail operations are anticipated to be similar to those along the PS&P rail line as described in Chapter 3, *Affected Environment, Impacts, and Mitigation*. For example, rail traffic along the BNSF main lines is anticipated to result in the following impacts.

- Increased emissions from more diesel trains.
- Increased emissions to surface waters as more trains cross waterways along the routes.
- Increased noise at grade crossings and along the route.
- Increased delay at rail-roadway grade crossings, including disruption to emergency vehicle response times.
- Increased safety and hazard risks related to grade-crossing accidents, derailments, and incidents.

These incremental impacts would be dispersed across rail routes in Washington State. Potential impacts from increased risk of derailment, oil spills, and incidents involving rail cars for the proposed action are addressed in Chapter 4, *Environmental Health and Safety*. Due to the overall increase in rail traffic in Washington State, the risk of a derailment, oil spill, or incident involving rail cars is expected to increase. Potential impacts would be similar to the potential impacts described in Chapter 4. Under the no-action alternative, potential impacts from increased rail traffic could occur.

5.5.1.2 Vessel Transport

Under the no-action alternative, the applicant would continue to load and unload bulk liquids at Terminal 1 consistent with current operations as described in Section 2.1.2.2, *Existing Operations*. The facility is permitted to load finished biodiesel onto rail cars, tanker trucks, or tank vessels. The mode of transportation offsite depends on market conditions and can vary widely year to year. The current volume of tank vessels calling at Terminal 1 to load and unload bulk liquids for Imperium Terminal Services is low, and is forecast to remain constant at approximately seven tank vessels annually under no-action. The incremental impact of such a small number of vessels on vessel traffic management, environmental and community resources, or environmental health risks within the context of the extended study area is not likely to pose a substantial environmental impact.

The proposed action would slightly increase rail and vessel traffic within the extended study area. This section discusses these increases, as well as potential impacts that may result from construction and routine operations of the proposed action.

5.5.2 Proposed Action

This section describes the impacts that could occur in the extended study area as a result of routine operation of the proposed action in the extended study area. No impacts in the extended study area are expected to result from construction of the proposed action.

5.5.2.1 Rail Transportation

Diluted bitumen and Bakken crude oil are currently being transported by rail coming through Spokane to facilities in the Columbia River and Puget Sound. The bulk of crude oil by rail traffic is currently going through the Columbia River Gorge, but could transit over other rail routes. With the introduction of additional oil trains resulting from the proposed action, the BNSF may consider other potential routes to transport loaded or empty oil trains.

Impacts on BNSF Main Lines

Based on capacity data for the BNSF main lines (Section 5.4.2.1, *Main Lines Routes in Washington State*) the BNSF has capacity to route crude oil (and/or other unit bulk trains) over all three of the east-west corridors from Spokane. However, the routing of crude oil over Stampede Pass or Stevens Pass would likely have negative impacts on BNSF rail operations in Washington State because unit trains would not be able to travel at high speeds on these routes. BNSF will likely continue to use the Columbia River Gorge route for loaded oil trains. Empty cars could be transported east via the Stampede Pass or the Columbia River Gorge routes.

Rail traffic for the proposed action would account for a small percentage of BNSF rail traffic in Washington State. With two one-way train trips per day, the new traffic would not be likely to affect traffic on the BNSF main line substantially.

Impacts on Rail Network Capacity from Future Crude Oil by Rail Transport to the Project Site

Proposed rail traffic would account for a small percentage of BNSF rail traffic in Washington State. The proposed rail traffic would account for approximately 2% of the expected 2035 capacity estimated by WSDOT for the rail line along the I-5 corridor and approximately 3% along the Columbia River Gorge.

Indirect Impacts on Other Resources

The addition of two one-way train trips per day on the BNSF main lines due to the proposed transport of crude oil could affect the natural and human environment in the extended study area. The following impacts could result from increased rail traffic.

- Increased emissions from more diesel trains.
- Increased noise at grade crossings and along the route.
- Increased delay at rail-roadway grade crossings, including disruption to emergency vehicle response times.
- Potential impacts from increased risk of derailment, oil spills, and incidents involving rail cars for the proposed action are addressed in Chapter 4, *Environmental Health and Safety*. Due to the increase in rail traffic, the risk of a derailment, oil spill, or incident involving rail cars is expected

to increase. Potential impacts would be similar to the potential impacts described in Chapter 4. Unavoidable and significant adverse environmental impacts in the extended study area are described in Section 5.7.

5.5.2.2 Vessel Transportation

The applicant's proposal to expand their bulk liquid storage facility would increase the throughput of bulk liquids (primarily crude oil) by vessel to or from the project site. The route taken by vessels upon their departure from Grays Harbor would depend on the vessels' final destinations. Domestically produced crude oil cannot be exported and would be transported from Grays Harbor by tanker or tank barge. The likely routes for these vessels would be along the western coast, either north to refineries in the Puget Sound area or south to refineries in California. Although transport of U.S. crude oil overseas is currently not allowed under U.S. law, it is possible for Canadian oil to be transported abroad, and overseas transport of U.S. oil could occur if current regulations were to change. Vessels carrying other bulk liquids could be arriving to unload at Terminal 1 or departing Terminal 1 for other domestic or foreign markets. Shipments of foreign crude oil (such as from Canada) and other bulk liquids destined for foreign markets could head to any port in the world from Grays Harbor so the routes would depend on the final destination.

Impacts on Puget Sound and Olympic Coast National Marine Sanctuary Vessel Traffic

The number of vessels from the proposed action (200) compared to the overall tank vessel traffic transiting Puget Sound (3,895) is small (less than 5%). Due to the small increase in vessel traffic in Puget Sound and the high level of safety requirements in place, the potential impact on vessel traffic in Puget Sound would not be significant. Due to the small increase in vessel traffic off the coast of Washington and a high rate of vessel compliance with the Area to Be Avoided (approximately 98%), the potential impact of the proposed action on the Olympic Coast National Marine Sanctuary vessel traffic would not be substantial.

Impacts on Shipping Routes and Vessel Traffic Management

Up to 200 tankers and tank barges are expected to call at the proposed facility. To put the increase in vessel traffic related to the proposed action in perspective, it is useful to compare the number of proposed action vessels to vessels recorded at other principal west coast ports. In 2012, 157,663 vessels were recorded at the principal ports in Washington, Oregon, and California. The addition of up to 200 vessel calls related to the proposed action would account for approximately 0.1% of all vessels calling at West Coast ports. This small increase in overall vessel traffic is not expected to result in substantial impacts on vessel traffic management in the extended study area.

Indirect Impacts on Other Resources

The addition of up to 400 tanker or tank barge transits for the proposed action would affect the natural environment in the extended study area. The increase in vessel traffic in the extended study area from the proposed action is small compared to overall vessel traffic. The following impacts could result from the small increase in vessel traffic due to the proposed action.

- Increased impacts on air quality from increased vessel traffic.
- Increased impacts on noise resulting from increased vessel traffic.

- Increased impacts on marine mammals from increased vessel traffic.
- Potential impacts on tribal resources (access to usual and accustomed fishing areas) from increased vessel traffic.
- Potential impacts from increased vessel traffic are addressed in Chapter 4, *Environmental Health and Safety*. Due to the small increase in vessel traffic, the risk of an oil spill or incident involving vessels may increase slightly. Potential associated impacts would be similar to the potential impacts described in Chapter 4. Unavoidable and significant adverse environmental impacts in the extended study area are described in Section 5.7.

5.6 What mitigation measures would reduce impacts on rail and vessel transport in the extended study area?

The increase in rail and vessel traffic in the extended study area from the proposed action is small relative to the existing and anticipated future traffic that will occur without the projects. A risk of an incident involving a major spill, fire, explosion, or derailment in the extended study area exists but has a low likelihood based on the small increase in overall rail and vessel traffic due to the proposed action. Therefore, no mitigation is proposed in the extended study area.

5.7 Would the proposed action have unavoidable and significant adverse impacts on rail and vessel transport in the extended study area?

As discussed in Chapter 4, *Environmental Health and Safety*, large oil spills, fires, or explosions would likely include unavoidable and significant adverse environmental impacts. Although the likelihood of a large spill, fire, or explosion is low, the potential for significant adverse impacts on the environment and human health in the case of such an incident is high. The specific impacts would vary based on the location, amount spilled, type of liquid, and weather conditions. Examples of these impacts are described in Section 4.7, *Impacts on Resources*. Existing regulatory requirements for the prevention, preparedness, and response to a large spill, fire, or explosion and mitigation measures to reduce impacts are detailed in Chapter 4. However, no mitigation measures would completely eliminate the possibility of a large spill, fire, or explosion from rail cars carrying crude oil or hazardous materials, nor would they completely eliminate the adverse consequences of a large spill, fire, or explosion.

Chapter 6
Cumulative Impacts

6.1 What are cumulative impacts?

Cumulative impacts are impacts that would result from the incremental addition of the proposed action to impacts from past, present, and reasonably foreseeable future actions. Cumulative impacts can result from individually minor, but collectively significant, actions that occur over time. The purpose of the cumulative impacts analysis is to ensure that decision-makers consider the full range of consequences for the proposed action, including the proposed action's incremental contribution to cumulative impacts on the environment.

This chapter describes the approach to conducting the cumulative impacts analysis, including what past, present, and reasonably foreseeable future projects are considered, and identifies the resource areas that are addressed in the analysis. It then describes cumulative impacts that could result from construction and operation of the proposed action, including potential risks associated with the handling, storage, and transport of the proposed bulk liquids, including crude oil. Lastly, this chapter presents any measures identified to mitigate the cumulative impacts of the proposed action and identifies any unavoidable and significant adverse cumulative impacts.

6.2 What is the study area and what resources were considered for the cumulative impacts analysis?

As discussed in the preceding chapters of this Draft EIS, the potential for impacts related to the proposed action are considered in terms of the potential to affect resources in the study area, which generally includes the project site, Puget Sound & Pacific Railroad (PS&P) rail line, and Grays Harbor. The extended study area includes the area that could be affected by increased rail traffic from the source of the proposed bulk liquids to Centralia, Washington, and the areas that could be affected by increased vessel traffic from the mouth of Grays Harbor to the point of final delivery.

In general, the scope of the cumulative impacts analysis is limited to those resources where the proposed action could have an additive impact in combination with other past, present, and reasonably foreseeable and similar future actions. Based on the analyses in Chapter 3, *Affected Environment, Impacts, and Mitigation*, and Chapter 4, *Environmental Health and Safety*, the proposed action would affect the following resources in each study area and could contribute to cumulative impacts. The potential for cumulative impacts in the extended study area is addressed in Section 6.5.8, *Extended Study Area*.

- Section 6.5.1, *Air*
- Section 6.5.2, *Noise and Vibration*
- Section 6.5.3, *Tribal Resources*

- Section 6.5.4, *Rail Traffic*
- Section 6.5.5, *Vehicle Traffic and Safety*
- Section 6.5.6, *Vessel Traffic*
- Section 6.5.7, *Environmental Health and Safety* (related to incidents of oil spills, fires, and explosions)

6.3 What are the relevant regulations for the cumulative impacts analysis?

This cumulative impacts analysis is prepared in accordance with the Washington State Environmental Policy Act (SEPA) (Chapter 43.21C Revised Code of Washington [RCW]), the SEPA Rules (Chapter 197-11-060 Washington Administrative Code [WAC]), and the SEPA Handbook.

Additional guidance developed by the Council on Environmental Quality (CEQ) in the handbook entitled *Considering Cumulative Effects under the National Environmental Policy Act* (1997) was also considered where SEPA requirements are consistent with requirements of the National Environmental Policy Act (NEPA).

6.4 What methods were used to analyze cumulative impacts?

The resource-specific methods and assumptions described in the respective resource sections of Chapter 3, *Affected Environment, Impacts, and Mitigation*, Chapter 4*, Environmental Health and Safety,* and Chapter 5, *Extended Rail and Vessel Transport,* were used for the cumulative impacts analysis. The cumulative impact analysis took the following approach.

- Addressed the resources with the potential to be affected by the proposed action as discussed in Chapter 3, *Affected Environment, Impacts, and Mitigation*; Chapter 4, *Environmental Health and Safety*; and Chapter 5, *Extended Rail and Vessel Transport*.
- Considered other actions in relation to the geographic scope of the proposed action.
- Considered other actions in relation to the temporal period of the proposed action.
- Relied on the best available data at the time of the analysis.
- Reached conclusions based on known regulations at the time of the analysis.

The boundaries for the cumulative impacts analysis were based on the geographic location of the proposed action and are described for each resource area. The analysis considered regional influences and activities, and the projected lifespan of the proposed project activities. The geographic extent of the cumulative impacts analysis area is described for each resource in Section 6.5, *What cumulative impacts were identified?* The cumulative impacts analysis period is 2017 to 2037.

This analysis considers the impacts on the environment resulting from the incremental impacts of the proposed action when added to other past, present, and reasonably foreseeable future

actions regardless of what agency (federal, state, local) or person (private citizen, nongovernment organization, corporation) undertakes the other actions. This analysis considers other actions that could affect the human or natural environment similar to the proposed action and that could add to the impacts of the proposed action.

6.4.1 Past and Present Actions

The following past and present actions have contributed to the existing condition of resources in at the project site, in Grays Harbor, and along the PS&P rail line.

- **Prior industrial development at the Port of Grays Harbor (Port) and ongoing terminal operations.** The Port owns four deepwater marine terminal facilities and provides services including pilotage, ship assistance, line handling and terminal stevedoring, and onsite cargo storage. The Port's terminals are supported by large, paved, secured cargo yards, the Port's own on-dock rail system, and more than 104,000 square feet of on-dock covered storage. The marine terminal rail system includes more than 50,000 feet of rail looping through the marina terminal complex (WorleyParsons 2014). A network of local roads with some collector and arterial roads provides access to the Port's terminal facilities.
- **Prior development of transportation infrastructure (roadways and rail lines) and ongoing maintenance of that infrastructure.** The terminal rail system connects to the PS&P main line, owned by Genesee and Wyoming, Inc. The PS&P short line, Class III railroad, connects to the BNSF Railway Company (BNSF) main line, a Class I railroad, in Centralia. The PS&P rail line can also connect to the Union Pacific main line in Centralia (WorleyParsons 2014). The PS&P rail line was constructed between 1889 and 1896. It currently moves products and materials for 30 industries.
- **Prior development of infrastructure for harbor navigation and ongoing maintenance of that infrastructure**. Grays Harbor is a tidal estuary with jetties at the entrance. The two jetties were originally constructed from 1889 to 1913 for harbor navigation. Other aids to navigation include a deepwater navigation channel (Grays Harbor Navigation Channel), turning basins, and anchorage areas for shallow and deep-draft vessels (WorleyParsons 2014). The navigation channel, anchorage areas, and turning basins are maintained by the U.S. Army Corps of Engineers (USACE) through periodic maintenance dredging.

6.4.2 Ongoing and Reasonably Foreseeable Future Actions

Requests for information on any planned infrastructure or construction projects scheduled to occur between 2017 and 2037 were sent to the Cities of Oakville, McLeary, Elma, Montesano, Hoquiam, and Aberdeen. In addition, Thurston County, Lewis County, Grays Harbor County, including the Grays Harbor Council of Governments, Cowlitz-Wahkiakum Council of Governments PS&P, the Port, the Quinault Indian Nation, and the Chehalis Tribe were also contacted. The following plans and elements were reviewed for this analysis.

- Cowlitz-Wahkiakum Council of Governments Metropolitan and Regional Transportation Improvement Programs 2015–2018 (August 2014)
- Grays Harbor Council of Governments 2013 Annual Report
- Cowlitz-Wahkiakum Council of Governments Fiscal Year 2013 Annual Report (July 1, 2012 to June 30, 2013); Southwest Washington Regional Transportation Planning Organization

- Washington State 2010–2013 Freight Rail Plan (December 2009)
- Cowlitz-Wahkiakum Council of Governments Metropolitan and Regional Transportation Plan 2009–2029 (November 2009)
- City of Hoquiam Comprehensive Land Use Plan (February 2009)
- Grays Harbor Council of Governments US 101 Regional Circulation Project – Final Report (January 2007)

Based on information gathered from the sources above, Table 6-1 lists future actions that could contribute to cumulative impacts on resources analyzed for the proposed action. The locations of these projects are show in Figure 6-1.

Figure 6-1. Cumulative Projects

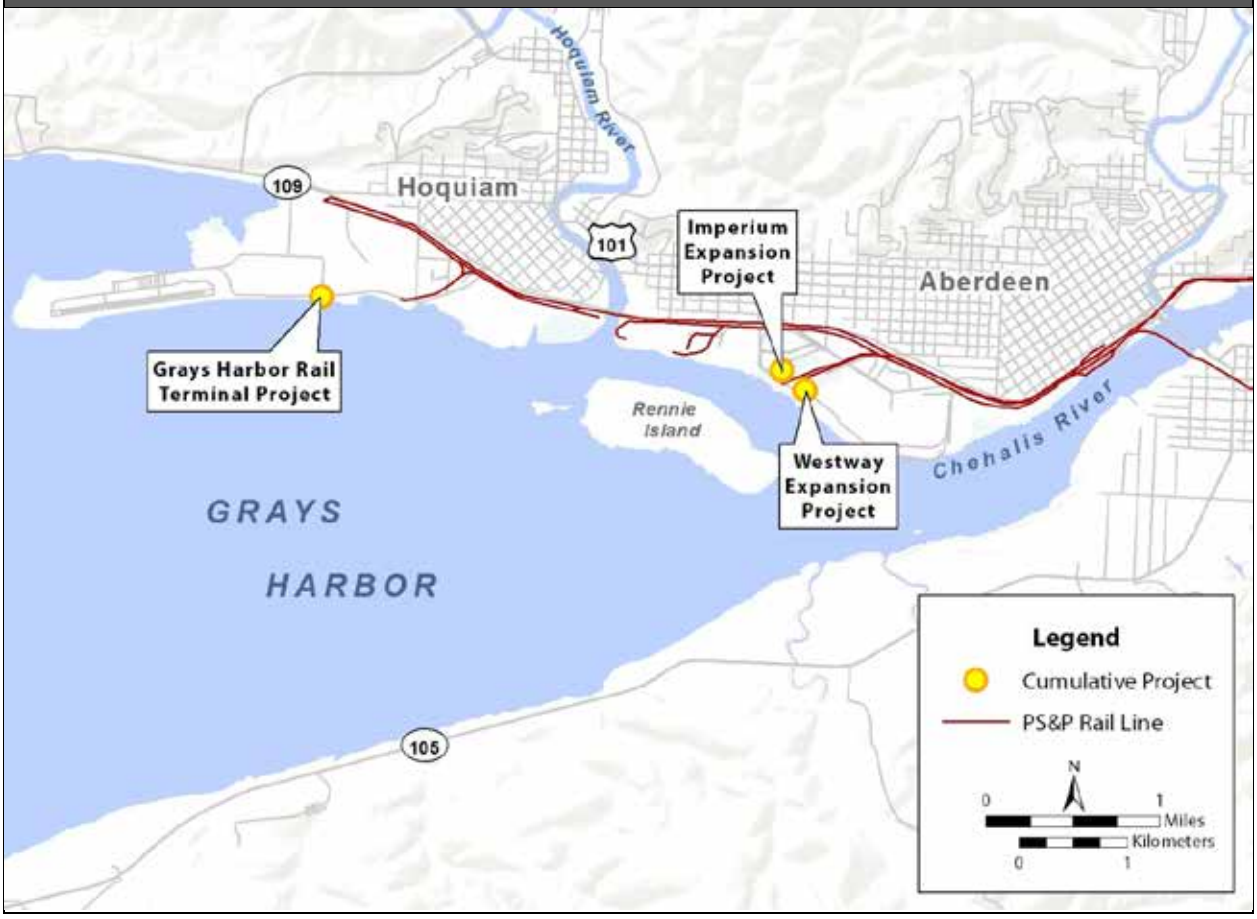


Table 6-1. Reasonably Foreseeable Future Actions Contributing to Cumulative Impacts

Project	Proponent	Location	Description	Contributing Activity	Schedule
Westway Expansion Project	Westway Terminal Company LLC	Port of Grays Harbor, Terminal 1	Westway Terminal Company LLC is proposing to expand the existing bulk liquids terminal to handle and store crude oil. The project would involve constructing additional storage tanks and expanding rail unloading capacity and vessel loading capacity on the site.	Proposed action would increase PS&P rail line traffic by 458 (loaded and unloaded) trips per year and vessel traffic in Grays Harbor by approximately 238 vessel trips per year.	Construction is anticipated to start in 2016 if permits are issued.
Imperium Expansion Project	Imperium Terminal Services LLC	Port of Grays Harbor, Terminal 1	Imperium Terminal Services LLC is proposing to expand the existing bulk liquids terminal to handle and store crude oil, ethanol, naphtha, gasoline, vacuum gas oil, jet fuel, no. 2 fuel oil, no. 6 fuel oil, kerosene, renewable jet fuel, renewable diesel, used cooking oil, and animal fat, in addition to currently permitted liquids, including biodiesel, petroleum diesel, vegetable oil, and methanol. The project would involve constructing additional storage tanks and expanding rail unloading capacity and vessel loading capacity on the site.	Proposed action would increase PS&P rail line traffic by 730 rail trips (loaded and unloaded) per year and vessel traffic in Grays Harbor by approximately 400 vessel trips per year.	Construction is anticipated to start in 2016 if permits are issued.
Grays Harbor Rail Terminal Project	USD Group LLC	Port of Grays Harbor, Terminal 3	USD Group LLC is proposing to construct a new bulk liquids terminal to handle and store crude oil. The project would involve constructing additional storage tanks and expanding rail unloading capacity and vessel loading capacity on the site.	Proposed action would increase PS&P rail line traffic by 365 rail trips (loaded and unloaded) per year and vessel traffic in Grays Harbor by approximately 120 vessel trips per year.	Construction is anticipated to begin within the next 2 years if permits are issued.

Project	Proponent	Location	Description	Contributing Activity	Schedule
Grays Harbor Navigation Improve-ment Project[a]	U.S. Army Corps of Engineers	Grays Harbor Navigation Channel	The project would deepen the navigation channel to 38 feet mean lower low water between the South reach and Cows Point reach.	Upon completion of channel deepening, the limiting design depth for the transit of large commercial vessels between the Bar Reach and Port terminals would be 38 feet mean lower low water.	Dredging for channel deepening is currently proposed to occur between 2016 and 2017.

[a] The Navigation Improvement Project would also contribute to cumulative impacts on vessel traffic.

Operations related to the Grays Harbor Navigation Improvement Project were considered in the development of vessel traffic projections related to the baseline or no-action alternative evaluated in this Draft EIS. For these reasons, the analysis of cumulative impacts focuses on cumulative impacts associated with construction and operation of the three projects proposed for development at the Port: the proposed action, the Westway Terminal Company LLC Expansion Project (Westway project), and Grays Harbor Rail Terminal project. These three projects are referred to as the cumulative projects.

Tables 6-2 and 6-3 summarize the rail and vessel traffic associated with the reasonably foreseeable future actions contributing to cumulative impacts of the cumulative projects.

Table 6-2. Rail Traffic for Reasonably Foreseeable Future Actions

	Rail Trips		
Project	**Daily**	**Weekly**	**Annual**
Westway Project	1.25	8.75	458
Imperium Project	2	14	730
Grays Harbor Rail Terminal Project	1	7	365
Total Rail Trips	**4.25**	**29.75**	**1,553**

Table 6-3. Vessel Traffic for Reasonably Foreseeable Future Actions

	Vessel Calls			Vessel Trips		
Project	**Daily**	**Weekly**	**Annual**	**Daily**	**Weekly**	**Annual**
Westway Project	0.3	2.3	119	0.7	4.6	238
Imperium Project	0.5	3.8	200	1.1	7.7	400
Grays Harbor Rail Terminal Project	0.2	1.2	60	0.3	2.3	120
Total Vessel Trips	**1.0**	**7.3**	**379**	**2.1**	**14.6**	**758**

6.5 What cumulative impacts were identified?

This section addresses the cumulative impacts on air, noise and vibration, tribal resources, rail traffic, vehicle traffic and safety, vessel traffic, and environmental health and safety that could result from the cumulative projects. This section also addresses potential cumulative impacts in the extended study area.

6.5.1 Air

This section discusses potential cumulative impacts on air that would result from construction and operation of the cumulative projects.

6.5.1.1 Study Area

The cumulative impacts study area for air includes Grays Harbor County where emissions from onsite operations would occur and where the majority of emissions related to offsite rail transport on the PS&P rail line and vessel transport in Grays Harbor would occur. Possible greenhouse gas (GHG) emissions associated with operations, rail and vessel transport, and combustion are considered.

6.5.1.2 Cumulative Impacts

The following section describes the criteria pollutants, toxic air pollutants, and GHG emissions that could result from the construction and routine operation of the cumulative projects

Criteria Pollutants

As presented in Chapter 3, Section 3.2, *Air*, air pollutants resulting from the proposed action are not anticipated to approach levels defined by the National Ambient Air Quality Standards (NAAQS). Although increased nitrogen oxide (NO_X) emissions during onsite operations of the proposed action would not exceed the NAAQS, the emissions are analyzed under a scenario where all cumulative projects perform activities at the same time.

The maximum cumulative nitrogen dioxide (NO_2) concentrations would occur if the following actions occurred simultaneously.

- The applicant is loading a vessel at the terminal while operating the vapor combustion unit at maximum capacity.
- Westway Terminal Company LLC is unloading crude oil from a unit train.
- USD Group LLC is loading crude oil at Terminal 3 and unloading a unit train.

Under these circumstances, the highest concentration of 1-hour NO_2 could occur resulting in an increase of NO_2 concentration that would slightly exceed the 1-hour NO_2 standard.[1] The 1-hour

[1] The maximum 1-hour NO_2 modeled concentration from the combined total from all three facilities would be about 145 micrograms per cubic meter of air (µg/m^3) (81 µg/m^3 for the Westway project, 14 µg/m^3 for the Imperium project, and 50 µg/m^3 for the Grays Harbor Rail Terminal project). Adding the maximum ambient 1-

NO_2 standard is 188 micrograms per cubic meter of air (μg/m^3), and the total NO_2 concentration based on the above scenario is 190 μg/m^3 of air. A violation of the NO_2 standard would not likely occur for the following reasons.

- The standard requires that the 3-year average of NO_2 be exceeded.[2]
- The analysis conservatively assumed a high percentage of NO_2 converted.[3]
- All of the mobile source activity as previously described would have to occur simultaneously during meteorological conditions that have the poorest dispersion conditions (i.e., very low wind speeds and a strong temperature inversion).
- The maximum 1-hour background concentration would need to occur simultaneously.

Additionally, incorporation of the mitigation described in in Section 6.5.1.3, *Mitigation Measures*, would further reduce the risks of exceeding applicable air quality standards.

Toxic Air Pollutants

Air dispersion modeling of diesel particulate matter (DPM) was conducted using the U.S. Environmental Protection Agency (EPA) AERMOD dispersion model[4] for rail activities between Poynor Yard and the three project sites.

Figures 6-2and 6-3 show the average increased inhalation cancer risk from DPM in 2017 and 2037[5] under cumulative conditions by illustrating the 100-per-million and 10-per-million risk levels. The air quality sensitive receptors[6] within these risk levels are also shown.

Under WAC 173-460, Controls of New Sources of Toxic Air Pollutants, Washington State Department of Ecology (Ecology) may recommend approval for a stationary source project that is likely to cause an exceedance of acceptable source impact levels for one or more toxic air pollutants if it is demonstrated that the increase in emissions of toxic air pollutants (such as DPM) would not likely result in an increased cancer risk of more than 10 in 1 million. However, this regulation only applies to stationary sources, not mobile sources such as rail locomotives. There are no local or state regulations for DPM emissions from mobile sources. For this reason, the 10-per-1-million risk level is not a threshold to determine significance of the impact. However, to provide context of the average increased inhalation cancer risk from DPM, the 10-per-million risk level is shown in Figures 6-2 and 6-3. For project-level impacts, EPA would

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hour NO_2 background concentrations of 45 μg/m^3, the total concentration would be 190 μg/m^3. The 1-hour NO_2 standard under NAAQS is 188 μg/m^3.

[2] The standard requires that the 3-year average of the 98th percentile of the daily 1-hour maximum not be exceeded.

[3] The modeling conservatively assumed that 80% of the emitted NO_x is converted to NO_2. It is unlikely that this high percentage of emitted NO_x is converted to NO_2 over the short travel distances where the maximum concentration is predicted to occur.

[4] AERMOD is a dispersion model recommended by EPA for estimating the impact of industrial sources of emissions on ambient air quality.

[5] Years 2017 and 2037 were modeled to assess the risk from DPM emissions over time because locomotives that emit less DPM than in 2017 will be in operation by 2037. The analysis assumes maximum throughput capacity in 2017 and 2037.

[6] A facility or land use that houses or attracts members of the population who are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses.

typically urge action to mitigate the increased risk of exposure at the 100-per-million risk level. Therefore, the 100-per-million risk level is also shown in Figures 6-2 and 6-3.

The analysis indicates if all cumulative projects are operating at maximum throughput, the 100-per-million-and-above risk level from rail operations would be limited to the project sites and the Westway project site in 2017 and 2037.

In 2017, the 10-per-million risk level from rail operations would extend from east of Poynor Yard to west of the Imperium project site. As shown in Figure 6-2, some residential land uses are within the 10-per-million risk level west and north of the PS&P rail line. Three sensitive receptors (West End Playfield, 28th Street Landing, and Viewing Tower) (Chapter 3, Section 3.2, *Air*), are also located within the 10-per-million risk level.

By 2037, the 10-per-million risk level is smaller and limited to the industrial area around the Westway and Imperium project sites, and around Poynor Yard (Figure 6-3). A portion of residential area and the 28th Street Landing and Viewing Tower could fall within the 10-per-million risk level north of the PS&P rail line. The risks are less compared to 2017 because the analysis considers that more efficient locomotives would be used by this time. As discussed in Section 3.2, *Air*, implementation of applicant mitigation measures would help to reduce these risks (Section 6.5.13, *Mitigation Measures*).

Figure 6-2. Average Cumulative Diesel Particulate Matter Inhalation Cancer Risk (2017)

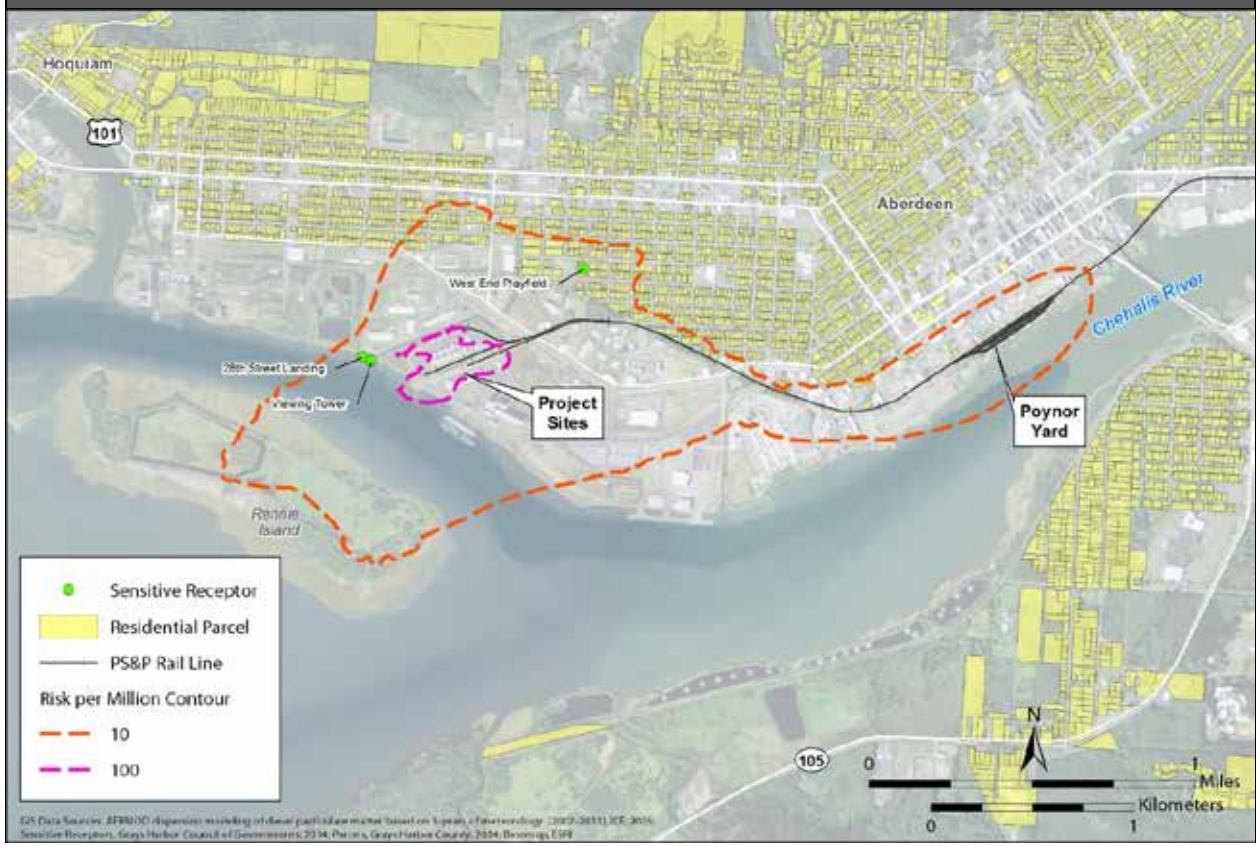
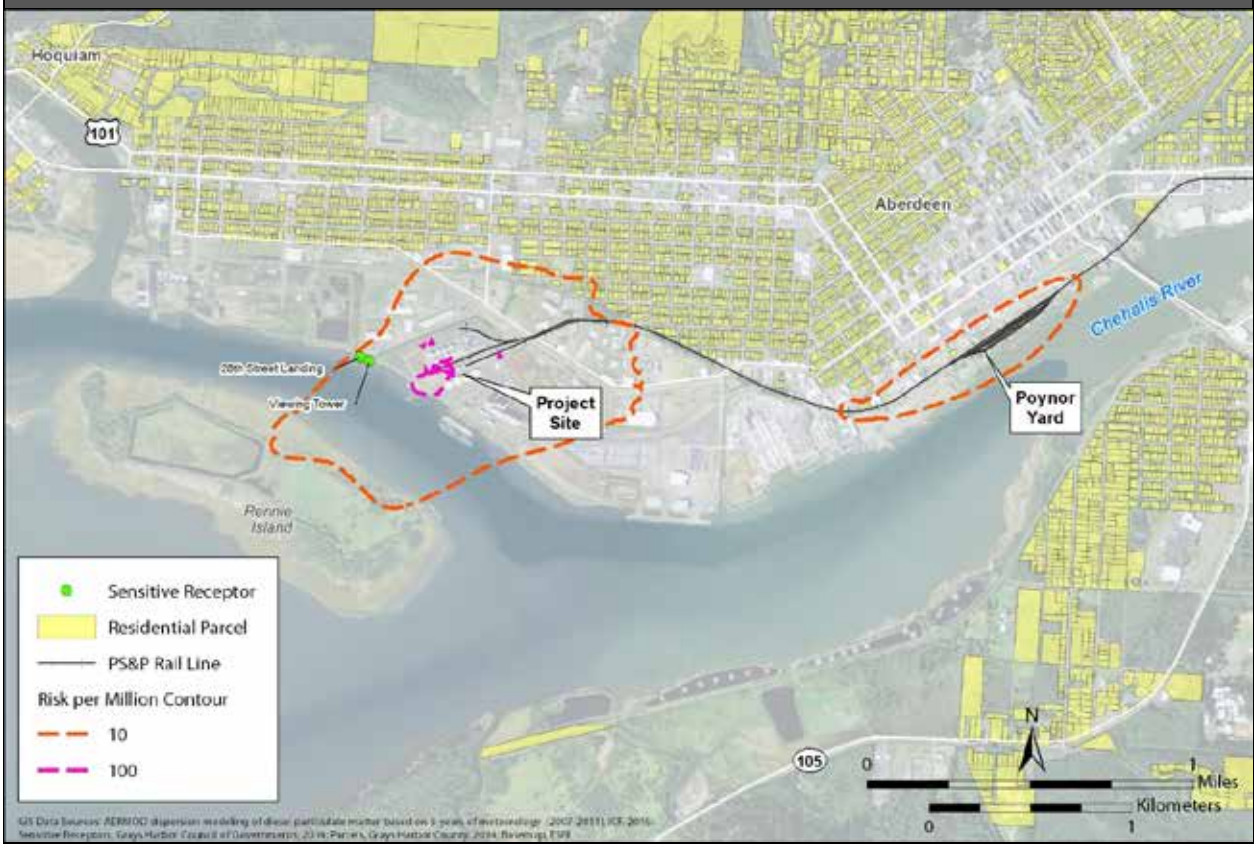


Figure 6-3. Average Cumulative Diesel Particulate Matter Inhalation Cancer Risk (2037)



Greenhouse Gas Emissions

The cumulative GHG emissions from transportation of crude oil and other products to and from the cumulative project sites, as well as operation of the facilities themselves, are presented in Table 6-4. Table 6-4 shows the additional annual GHG emissions associated with operations of the cumulative projects, including the GHG emissions from transport of the bulk liquids through the state. The largest contribution of GHG emissions would result from rail transport and represents an increase of approximately 7.8% in the statewide rail emissions of GHGs. Overall GHG emissions related to operation of the proposed action represent about a 0.11% increase in statewide GHG emissions. The statewide GHG emissions include sources of GHG emissions in Washington State.

Table 6-4. Annual Average GHG Emissions Compared to Statewide 2011 GHG Emissions ($MTCO_2e$/year)

Source Type	Washington State[a]	Westway Project	Imperium Project	Grays Harbor Rail Terminal Project	Total	Increase (%)
Rail	1,000,000	25,532[b]	35,709[b]	16,646[b]	77,887	7.79
Marine vessels	3,300,000	783[c]	1,417[c]	2,394[c]	4,594	0.14
Industrial sources (project site)	3,700,000	4,052[d,e]	6,634[d,f]	10,586[d,g]	21,272	0.57
Total	**91,700,000**	**30,367**	**43,760**	**29,645**	**103,753**	**0.11**

[a] Washington State Department of Ecology 2014a
[b] Rail transport throughout the state; includes on-site rail emissions.
[c] Includes emissions from vessels hoteling at the Terminal 1 dock (i.e., on-site vessel emissions).
[d] On-site stationary sources
[e] Trinity Consultants 2015a
[f] Trinity Consultants 2015b
[g] HDR Engineering, Inc. 2014
$MTCO_2e$ = metric tons of carbon dioxide equivalent

World Resources Institute maintains an online database of global GHG emissions that is developed using a consistent method to estimate emissions for the key GHGs. It is based on inventory data provided by EPA, the U.S. Department of Energy, the Food, and Agriculture Organization of the United Nations, and the International Energy Agency. In 2011, global emissions were estimated to be 43,372.71 million metric tons of carbon dioxide equivalent emissions (CO_2e)[7] and U.S. emissions were estimated to be 6,550.10 million metric tons of CO_2e (World Resources Institute 2014). In 2011, Ecology reported that Washington State contributed 91.7 million metric tons of CO_2e, a decrease from the peak of 101.6 million metric tons in 2007 (Washington State Department of Ecology 2014a).

GHG emissions from the cumulative projects would represent approximately 0.1% of total Washington State emissions. Revised Code of Washington (RCW) 70.235.020, sets the following GHG statutory reduction levels.

- By 2020, reductions to 1990 emission levels.
- By 2035, reductions to 25% below 1990 levels.
- By 2050, reductions to 50% below 1990 levels or 70% below the state's expected emissions that year.

[7] Carbon dioxide equivalent (CO_2e) is a metric used to compare the emissions of the different greenhouse gases based on their global warming potential. It represents the amount of carbon dioxide emission that would cause the same integrated radiative forcing, over a given time horizon, as an emitted amount of a greenhouse gas or a mixture of greenhouse gases. The equivalent carbon dioxide emission is obtained by multiplying the emission of a greenhouse gas by its global warming potential for the given time horizon (Intergovernmental Panel on Climate Change 2013).

In order to meet these reductions, Washington State must reduce emissions to 88.4 million metric tons per year by 2020, 66.3 million metric tons by 2035, and approximately 44.2 million metric tons by 2050.[8] The GHG emissions from the cumulative projects would be approximately 0.23% of Washington State's statutory reductions of 44.2 million metric tons of CO_2e per year (half of the 1990 level) by 2050.

In November 2014, the United States entered into a nonbinding agreement with China to reduce emissions 26 to 28% below 2005 levels (White House 2014). This national goal translates to annual emissions between 4,628 and 4, 756 million metric tons by 2025. The GHG emissions from the cumulative projects would represent approximately 0.002% of these national targets.

According to the International Panel on Climate Change, cumulative GHG emissions should be limited to 1 trillion metric tons (total) by 2050 or the planet will exceed the 2°C warming threshold. Currently, the amount of GHGs that have been emitted worldwide since the Industrial Age is estimated to be 592 billion metric tons (Oxford E-Research Center 2015). Cumulative worldwide emissions must be limited to 408 billion metric tons to meet the 2050 target. Emissions from the cumulative projects would constitute 0.00003% of this limit.

The end use of the products handled by the facilities would also result in CO_2 emissions. Different products produce different amounts of $C0_2$. Table 6-5 illustrates the different CO_2 emission factors associated with the combustion of the products that could be shipped through the facilities. The analysis used EPA's average heat content of crude oil of 5.80 million British thermal units (Btu) per barrel (U.S. Environmental Protection Agency 2013) and the highest emissions factor[9] for the product likely to be handled by the facilities[10] listed in Table 6-5. This determined the maximum amount of CO_2 emissions from end use of products shipped through the proposed facilities in a given year is 26,494,153 metric tons of CO_2 per year (Westway project is 6,272,352 metric tons of CO_2 per year, Imperium project is 13,067,400 metric tons of CO_2 per year, and Grays Harbor Rail Terminal project is 7,154,401 metric tons CO_2 per year).

[8] Total emissions needed to reach the Washington State statutory reductions were calculated based on the required reduction from the most recently available statewide inventory of 91.7 $MMTCO_2e$ in 2011. (Washington State Department of Ecology 2014).

[9] The emissions factor represents the number of kg of CO_2 that would be emitted for each million Btu of a given product.

[10] Kerosene has the highest emission factor but crude oil is expected to be the main product handled by all three facilities.

Table 6-5. Estimated CO_2 Emissions Factors for Oil Combustion

State or Condition	Products	CO_2 Emissions Factors (kg CO_2 per mmBtu)
Refined	Gasoline	70.22
	Kerosene	75.20
	Naptha	68.02
	Jet fuels	72.22
	No. 2 fuel oil (diesel oil)	73.96
	No.6 fuel oil (bunker c oil)	75.10
	Vacuum gas oil	73.00 (Estimate)
Unrefined	Bakken crude oil[a]	73.96
	Diluted bitumen[b]	75.10
Non-Petroleum Fuels		
Pure (unblended)	Ethanol	68.44
Can be composed of 20–80% of plant-based fuel	Renewable jet fuel	72.22 (Estimate)
Can be composed of 20–80% of plant-based fuel	Renewable diesel	73.84
Variable composition	Used cooking oil/animal fat	71.06

Source: U.S. Environmental Protection Agency 2013
[a] Emissions factor for no. 2 fuel oil was used for Bakken crude oil.
[b] Emissions factor for no. 6 residual fuel oil was used for diluted bitumen.
kg CO_2 per mmBtu = kilograms of carbon dioxide per million British thermal units.

Whether the cumulative projects result in an increase in GHG emissions relative to the no-action alternative depends on speculative factors. For example, the relative contribution of the cumulative projects to the net change in CO_2 emissions would depend on whether the cumulative projects result in increased demand for crude oil or displace other crude oil consumed by end users (which depends, in part, on the source and final destination of the oil), what type of crude oil is being transported (i.e., which emissions factors are used), and what the end use is (e.g., combustion, development of other products).

The analysis made the following assumptions to calculate the maximum potential amount of GHG emissions related to combustion.

- The entire amount of crude oil to be handled by the cumulative projects facilities would be additive (would not be substituting for other sources of crude oil).
- The oil would be diluted bitumen (highest emission factor).
- The end use for the entire amount would be combustion.

However, it anticipated that the majority of crude oil to be handled and stored at the proposed facilities would come from domestic sources (e.g., Bakken crude oil). This crude oil can only be transported to U.S. refineries, which are limited in capacity by law. Therefore, this oil would replace oil currently used in U.S. refineries and there would be no net increase in overall emissions. Although diluted bitumen was used for the analysis. Bakken oil would most likely be the main product handled by the facility. Because it has a lower emissions factor, it would generate fewer emissions. While most of the crude oil is likely to be refined into products used

for combustion, some final products, such as asphalt would not be combusted so the emissions would be less.

As noted above, it is expected that much of the crude oil transported to the facilities would replace crude oil that was previously transported by tank vessel, mostly from Alaska. In the Marine & Rail Oil Transportation Study, Ecology stated the following.

> …historically, 90% of crude oil bound for Washington's refineries was delivered here by tank ship from Alaska or from other international sources of oil. Today pipeline and rail delivery of crude oil make up more than 30% of our imports, while vessel delivery is reduced to less than 70%. Crude oil transportation is rapidly shifting to delivery by rail and pipeline (Washington State Department of Ecology 2014b).

Also, based on market demand, crude oil may be refined into multiple products that may or may not have significant GHG emissions (e.g., asphalt is not combusted and is a crude oil product). This analysis assumes that all of the oil would be refined into fuel and combusted, which likely overstates total GHG emissions from the cumulative projects. Even if the proposed facilities are not built, additional GHG emissions from end use may still occur over the analysis period because the product could be transported to another facility for domestic use or export.

Because of these factors, the GHG emissions related to combustion represent the maximum potential increase in GHG emissions. This increase is dependent on the specific market conditions, end use of the product, and properties of the oil. The net GHG emissions could be considerably lower.

Regardless of the end-use emissions scenario, the cumulative projects would not have an impact on the crude oil market in the United States. In 2013, 7.45 million barrels of crude oil were produced in the United States, and 7.72 million barrels of crude oil were imported every day. Together, this equals 15.17 million barrels of crude oil supplied to the United States every day (U.S. Energy Information Administration 2015). The total amount of oil transported by the cumulative projects would be 176,110 barrels per day (Table 6-6) or 1.2% of the U.S. daily crude oil supply. Because of this small volume, the cumulative projects would not likely affect the crude oil market.

Table 6-6. Proposed Daily Throughput Compared to National Average—Cumulative Projects

Proposed Project	Daily throughput (barrels per day)	Daily US Crude Oil Supply (percent [%] of 15.17 million barrels per day)
Westway Project	48,918	0.3%
Imperium Project (for all tanks)	82,192	0.5%
Grays Harbor Rail Terminal Project	45,000	0.3%
Total	**176,110**	**1.2%**

Climate Change

GHG emissions from the cumulative projects would contribute to global GHG emissions, which contribute to climate change. This section describes the projected impacts of climate change in the Pacific Northwest.

Earth's climate is primarily controlled by the balance of incoming energy from the sun and reflected energy from the Earth's surface. Heat and light from the sun is either reflected or absorbed by the Earth's surface and its atmosphere. GHGs (carbon dioxide, methane, nitrous oxide, water vapor, ozone, and hydrofluorocarbons) can trap outbound radiation in the Earth's atmosphere. GHGs are released through natural sources, such as CO_2 emitted from aerobic respiration or organic decomposition. GHGs are also released as a result of human activities, such as the combustion of fossil fuels, industrial processes, land use change, deforestation, agricultural production, solvent use, and waste management.

The *Intergovernmental Panel on Climate Change (IPCC) Fifth Assessment Report* states the warming of the global climate system is unequivocal, and each of the last three decades has been successively warmer at the Earth's surface than any preceding decade since 1850. Additionally, from 1880 to 2012, the globally averaged, combined land and ocean surface temperature data show a warming of 0.85°C, or 1.5°F (Intergovernmental Panel on Climate Change 2013). This warming has coincided with increased concentrations of GHGs in the Earth's atmosphere.

The Intergovernmental Panel on Climate Change, the National Research Council, and the U.S. Global Change Research Program have concluded that it is extremely likely (a 95 to 100% chance) that global increases in atmospheric GHG concentrations and global temperatures are caused by human activities. Washington State's Climate Impacts Group has researched the potential impacts of climate change in the Pacific Northwest and concluded that there will be substantial impacts by the middle of the 21st century (Climate Impacts Group 2015). Changes to temperature, precipitation, and sea level are predicted (Mote et al. 2014). Observed and projected increases in temperatures, shifts in precipitation, and changes in flood patterns reflect regional patterns across Idaho, Oregon, and Washington. Changes in sea-level rise are localized to the Oregon and Washington coasts.

An increase in the overall temperature of the Earth causes large-scale changes throughout the Earth's climate system, including higher sea levels, changes in precipitation, and altered weather patterns (e.g., an increase in more extreme weather events). These changes affect the natural and built environment and humans.

Ocean acidification is also a result of increasing levels of CO_2. The Earth's oceans absorb excess CO_2 from the atmosphere, making seawater more acidic. More acidic waters threaten Washington State's shellfish industry and tribal resources and could affect the marine foodweb. Ocean acidity is increasing at a faster rate than predicted, and this increase may reduce the ability of oysters and other species to form shells (Washington State Blue Ribbon Panel on Ocean Acidification 2012).

Temperatures across the region increased by 1.3°F during the 1895 to 2011 period (Kunkel et al. 2013 in Mote et al. 2014). Temperatures are projected to continue increasing with average annual temperatures increasing 3.3 to 9.7°F[11] by the end of the century compared to the 1970 to 1999 period (Mote et al. 2014).

From 1895 to 2011, there has not been a statistically significant change in annual precipitation across the Northwest. However, the variability of annual precipitation has increased since 1976

[11] The range reflects changes projected under the lower (B1) and higher (A2) emissions scenarios, as defined by the Intergovernmental Panel on Climate Change *Special Report on Emissions Scenarios (SRES)*.

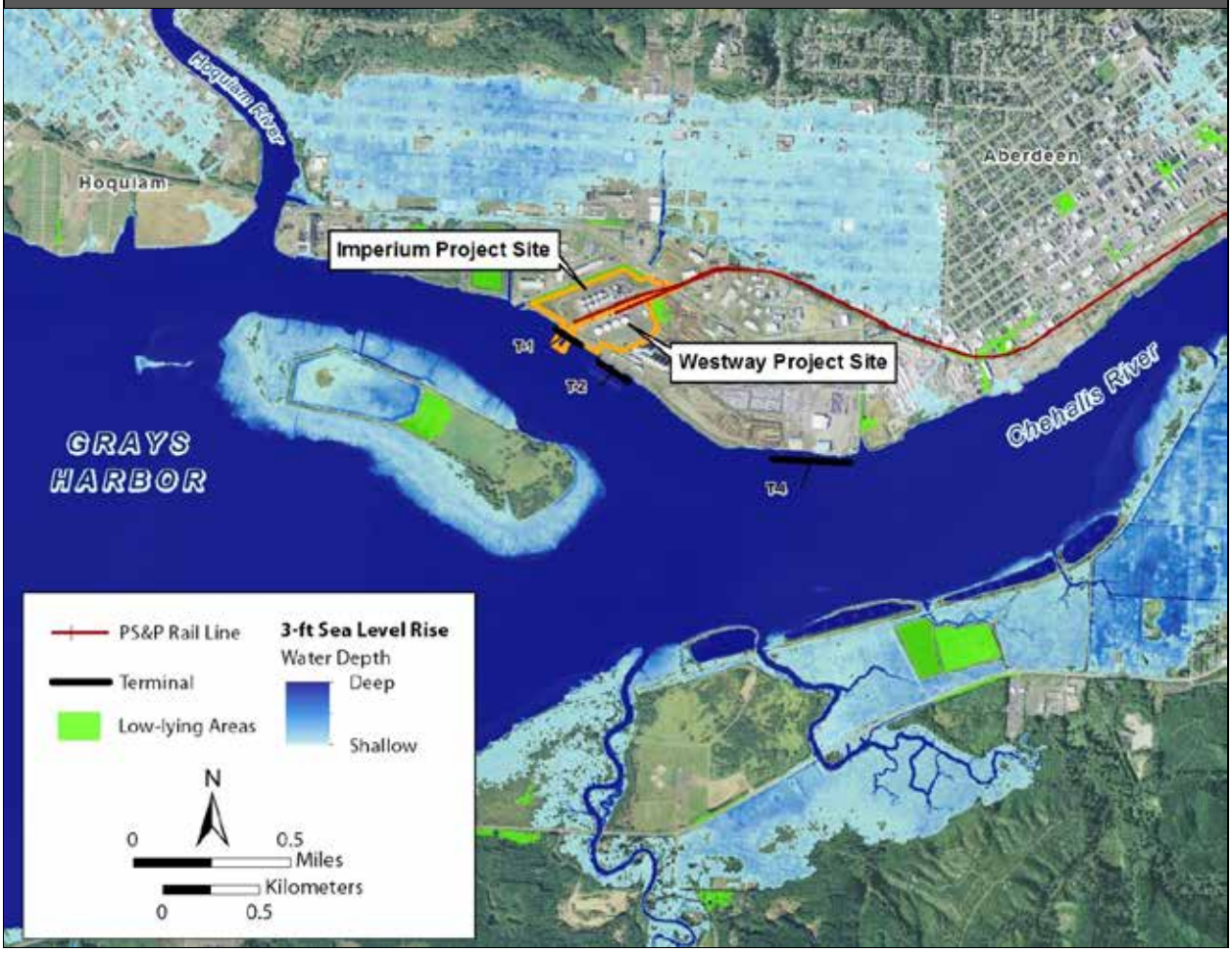
compared to the previous 75 years (Kunkel et al. 2013). Similarly, projected changes in precipitation are less certain with climate and various emissions futures resulting in a range of wetter and drier future conditions. Plausible futures range from an 11% decrease to a 12% increase in annual average precipitation by mid-century (Mote et al. 2014).[12] Seasonal shifts, such as a wetter spring and dryer summer, could be obscured by annual averages. An increase in heavy downpours may result in an increase in flood risk in rain-snow and rain-dominant basins (Mote et al. 2014), which could lead to greater flooding from the Chehalis, Humptulips, Wynoochee, and Wishkah Rivers because they originate in primarily rain-dominant basins.

As global temperatures rise, the oceans warm and expand, and ice caps and glaciers melt. This causes sea levels to rise. Global sea level has risen about 7 inches during the 20th century and is projected to rise at a higher rate in the future (National Research Council 2012).

The analysis period for the cumulative projects is 2017 to 2037. Sea level rise along the Washington, Oregon, and California coasts is projected to increase 24 inches by the end of the 21st century with projections ranging up to 9 inches (0.75 feet) of sea level rise by 2030 (National Research Council 2012).[13] Intensifying coastal storms could increase the likelihood of more severe coastal flooding and erosion (Dalton et al. 2013); however, as shown in Figure 6-4, even with a conservative estimate of 3 feet of sea-level rise, floods are not expected to affect the proposed facilities.

[12] Increase is relative to the 1970 to 1999 average and based on an ensemble of projections from 21 climate models and the low (B1) and high (A2) emissions scenarios.
[13] The National Research Council 2012 report provides a projection (a single estimate) and a range (high and low estimate) of projections for 2030, 2050, and 2100.

Figure 6-4. Sea-Level Rise and Coast Flooding Impacts in the Study Area



Source: National Ocean and Atmospheric Administration 2015

6.5.1.3 Mitigation Measures

The incremental increase in air emissions related to the cumulative projects could result in a slight exceedance of NAAQS threshold for NO_X, increases in DPM, and increased GHG emissions. Implementation of the applicant mitigation measures identified in Section 3.2, *Air*, and repeated below, would also help to offset cumulative impacts.

- The applicant will ensure that all engine-powered equipment and vehicles used in construction, operation, and maintenance at the facility are subject to a regular inspection and maintenance schedule in order to minimize air pollutant emissions, GHG emissions, and fuel consumption. Preventive maintenance activities will include but not be limited to the following actions.
  - Replacing oil and oil filters as recommended by manufacturer instructions.
  - Maintaining proper tire pressure in on-road vehicles.
  - Replacing of worn or end-of-life parts.
  - Scheduling routine equipment service checks.

- The applicant will develop and implement an anti-idling policy for both construction and operation and ensure that equipment operators receive training on best practices for reducing fuel consumption in order to reduce project-related GHG emissions. The anti-idling policy will include required warmup periods for equipment and prohibit idling beyond these periods. The policy will define any exemptions where idling is permitted for safety or operational reasons, such as when ambient temperatures are below levels required for reliable operation. In addition, the use of technologies such as idle management systems or automatic shutdown features will be considered part of the policy.
- To identify NO_X emissions if the Westway, Imperium, and Grays Harbor Rail Terminal Projects are approved, the applicant will ensure air monitoring stations are installed to monitor the NO_2 emissions at or near the facility prior to the third proposed facility beginning operations. Air monitoring reports will be submitted to Olympic Region Clean Air Agency annually. If levels are observed to be approaching the NAAQS then additional measures could be required in the agency's air permit.
- To monitor DPM emissions associated with rail operations at and near the project site, the applicant will ensure a DPM monitoring station is installed prior to beginning operations. The applicant will ensure the DPM emission report is submitted to the City of Hoquiam annually. The City of Hoquiam will coordinate with the City of Aberdeen, Ecology, and the Olympic Region Clean Air Agency as applicable, to review the emission report. If DPM emissions are observed to approach levels of concern for sensitive receptors, then the City of Hoquiam will require the applicant to modify operations to reduce DPM emissions. These actions could include the following.
  - Modifying or reducing switching operations between Poynor Yard and the project site to reduce DPM emissions during switching operations.
  - Installing a commercial idle control retrofit device on switching locomotives to reduce DPM emissions from idling.
  - Using Tier 3 or Tier 4 compliant[14] switching engines at Poynor Yard.
- To reduce GHG emissions, DPM, and other air pollutants from the locomotives, idling will be minimized to the maximum extent practicable. Shutting down locomotive engines as soon as practicable when not in use and delaying restart until necessary for car switching or departure from the facility would reduce these pollutants.
- To minimize idling from trains and vessels and resulting emissions, the applicant will coordinate with the Port and PS&P to manage waiting times for rail and vessel arrivals or departures.

6.5.1.4 Unavoidable and Significant Adverse Environmental Impacts

The cumulative projects would result in increased air emissions, most notably of NO_2 and DPM. Compliance with the applicable regulations along with implementation of the mitigation measures described above would reduce cumulative impacts on air quality. There would be no unavoidable and significant adverse cumulative impacts.

[14] These refer to standards for implementing EPA's program to improve locomotive efficiency to reduce emission of particulate matter and nitrous oxides.

6.5.2 Noise and Vibration

This section discusses potential cumulative impacts on noise that would result from construction and operation of the cumulative projects.

Based on the analysis in Chapter 3, Section 3.7, *Noise and Vibration*, the proposed action would have negligible onsite noise and vibration impacts from construction or routine operations at the project site and during vessel transport. The noise and vibration would be similar to levels generated by other industrial activities in the Port. For this reason, only the potential cumulative impacts on noise from rail operations are discussed in this section.

6.5.2.1 Study Area

The cumulative impacts study area for noise includes areas that could be affected by increased noise related to rail transport on the PS&P rail line.

6.5.2.2 Cumulative Impacts

The following section describes the noise impacts that could result from the routine operation of the cumulative projects.

The cumulative projects would increase train traffic on the PS&P rail line by 4.25 trips per day. As described in Chapter 3, Section 3.7, *Noise and Vibration*, Federal Railroad Agency/Federal Transit Administration guidance manual (FRA/FTA Manual) methods use the day-night sound level (L_{dn}) to evaluate potential noise impacts with rail projects.[15] Because L_{dn} measures the average sound level over a 24-hour period, the addition of an average of 4.25 trips operating daily on the PS&P rail line would increase the average noise level along the PS&P rail line. This means that more people along the PS&P rail line would experience rail noise more frequently because more trains would be operating on the rail line and the average noise level would increase. In addition, the distance from the PS&P rail line within which sensitive receptors would be exposed to noise increases that meet FRA/FTA criteria for noise impacts[16] would also increase.

Table 6-7 presents the number and general location of noise-sensitive receptors that would be exposed to increased rail traffic noise from the cumulative projects on the PS&P rail line. Based on the analysis, cumulative rail traffic would increase wayside noise. Approximately 78 receptors would be exposed to noise increases that meet the FRA/FTA criteria for moderate impacts,[17] primarily in the Elma-Satsop and west of Montesano/east of Aberdeen areas. Approximately 10 receptors would be exposed to higher noise increases that meet the FRA/FTA criteria for severe impacts,[18] all at PS&P rail line grade crossings[19] in Elma (North 11th Street, North 13th Street, and North 17th Street).

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[15] This is a 24-hour average noise level (in A-weighted decibels [dBA]) with a 10-decibel upward adjustment of noise levels occurring at night. This adjustment is made to account for most individuals' increased sensitivity to noise at night.

[16] See Chapter 3, Section 3.7, *Noise and Vibration*, for the FRA/FTA criteria.

[17] The change in the noise level would be noticeable to most people but may not be enough to cause strong adverse community reactions. For more information, see Section 3.7, *Noise and Vibration*.

[18] A significant percentage of people would be highly annoyed by the noise. For more information, see Section 3.7, *Noise and Vibration*.

[19] Throughout this chapter, *grade crossings* refer to at-grade crossings on the PS&P rail line.

Table 6-7. Estimated Counts of Sensitive Receptors Exposed to Increased Noise on the PS&P Rail Line—Cumulative Projects

Analysis Segment	Location	Grade Crossings[a]	Number of Grade Crossings	General Land Use Characteristics	Horn		Wayside	
					Moderate Impact[b]	Severe Impact[b]	Moderate Impact[b]	Severe Impact[b]
A	Centralia	1–8	8	Higher-density single family residential and commercial	143	0	0	0
B	Unincorporated Centralia, Rochester (south of US 12)	9–20	12	Single-family residential and commercial	47	15	1	0
C	Rochester (between US 12 and Littlerock Road SW)	21–24	4	Single-family residential and commercial	18	4	3	0
D	Rochester (west of Littlerock Road SW)	25–30	6	Single-family residential and commercial	23	5	0	0
E	Oakville	31–42	12	Lower-density single-family residential and commercial	41	3	0	0
F	Malone-Porter	43–54	12	Lower-density single-family residential	81	26	8	0
G	Elma-Satsop	55–72	18	Medium-density single-family residential	268	148	32	10
H	Montesano	73–84	12	Medium-density single-family residential	44	16	0	0
I	West of Montesano/east of Aberdeen	85–92	8	Medium-density single-family residential	45	27	34	0
J	Aberdeen	93–103	11	Single-family residential and commercial	46	9	0	0
Total					**756**	**253**	**78**	**10**

Notes:
[a] See Chapter 3, Figure 3.7-2, for the location of grade crossings.
[b] As defined by FRA/FTA criteria. For more information, see Chapter 3, Section 3.7, *Noise and Vibration*.

The most substantial potential for increased noise would occur from locomotive train horns sounding at grade crossings for public safety. Based on the analysis, noise exposure would occur near grade crossings along the PS&P rail line with the highest increases in the Elma-Satsop area. In total, approximately 756 receptors along the PS&P rail line would be exposed to increased noise from locomotive train horns that would meet the FRA/FTA criteria for moderate impacts at 83 grade crossings. This includes the eight grade crossings in Centralia that have high levels of existing surface transportation noise exposure. Rail traffic noise from the cumulative projects would add to the existing high levels of noise exposure.

Approximately 253 additional receptors would be exposed to increased noise that would meet the FRA/FTA criteria for severe impacts. These receptors are near 51 grade crossings along the rail line, with a majority (approximately 148 receptors) in the Elma-Satsop area.

Table 6-8 illustrates the grade crossings exposed to the highest noise increases from train horn noise. For information on noise increases at all grade crossings, see Appendix G, *Noise Data*.

Table 6-8. Grade Crossings with the Most Sensitive Receptors Exposed to the Highest Noise Levels from Train Horns[a]

Grade Crossing[a]	Grade Crossing Description	Location	Number of Receptors
55	North 2nd Streets	Elma	32
61	North 11th Street	Elma	24
62	North 13th Street	Elma	20
91	Private Crossing	Central Park	14
58	North 6th Street	Elma	14
85	Country Farm Road	Montesano	12
63	North 17th Street	Elma	10
65	Hurd Road	Satsop	10
60	North 10th Street	Elma	8
73	Old Monte Brady Road	Brady	6
45	Private Crossing	Malone-Porter	6
59	North 9th Street	Elma	6
57	North 5th Street	Elma	6

[a] Between 1 and 4 sensitive receptors would be exposed to the highest increase in train horn noise at 38 other grade crossings.
[b] See Chapter 3, Figure 3.7-2, for the location of grade crossings.

As described in Chapter 3, Section 3.7, *Noise and Vibration*, the relative impacts from exposure to increased noise would depend on the existing noise level. As the existing level of noise exposure increases, the additional noise exposure needed to cause a higher-magnitude impact decrease. On average, potentially affected receptors would generally experience an average increase in noise exposure over the course of any given day. However, it is not possible to predict when trains would be traveling along the PS&P rail line. All trains would travel at the same speed as existing trains, and would continue to sound horns consistent with existing operational practices. Sensitive receptors would experience train horns sounding more frequently because an additional 4.25 trips would operate on the PS&P rail line.

6.5.2.3 Mitigation Measures

Rail traffic from the cumulative projects would substantially increase noise along the PS&P rail line. As described Section Chapter 3, Section 3.7, *Noise and Vibration*, railroad noise is exempt from Washington State and local noise limits; however, implementation of the measures identified in Section 3.7, *Noise and Vibration*, and repeated below, would also reduce cumulative impacts.

- To reduce construction noise at nearby sensitive receptors, the applicant will maintain construction and maintenance equipment in good working order with properly functioning mufflers to control noise.
- To address increased noise from rail traffic, the applicant will coordinate with PS&P and interested communities along the PS&P rail line on the creation of quiet zones, if requested. Elimination of locomotive horn sounding at the affected grade crossings would eliminate and not just reduce increased horn noise. Quiet zones can only be established by public agencies using a procedure established in FRA regulations. This may include installation of enhanced safety measures at grade crossings such that sounding train horns would not be required. Implementation of a quiet zone is subject to FRA approval. Quiet zones include measures to maintain the level of safety while reducing noise.

6.5.2.4 Unavoidable and Significant Adverse Environmental Impacts

The cumulative projects would result in increased rail traffic that could cause substantial increases in noise along the PS&P rail line, depending on the specific location. This could result in noise increases that meet the FRA/FTA criteria for severe impacts on sensitive receptors. These increases represent approximately 263 total receptors and up to approximately 32 receptors affected at any one grade crossing. These severe noise impacts would be from train horn noise for public safety at approximately 253 receptors, and from train wayside noise at approximately 10 receptors. In Centralia, the cumulative projects would add noise to an existing noisy environment and cause moderate impacts per FRA/FTA criteria. Mitigation described above would reduce cumulative noise impacts. However, as long as train horns continue to sound for safety at the grade crossings, the potential for exposure to significant adverse noise impacts would remain.

6.5.3 Tribal Resources

This section discusses potential cumulative impacts on tribal resources that would result from construction and operation of the cumulative projects.

6.5.3.1 Study Area

The cumulative impacts study area for tribal resources consists of tribal resources near the project sites that could be affected by construction and routine operations of the cumulative projects. The cumulative study area also includes tribal resources that could be affected during routine rail transport along the PS&P rail line and routine vessel transport through the Grays Harbor Navigation Channel.

6.5.3.2 Cumulative Impacts

The following section describes the potential impacts on tribal resources that could result from the construction and routine operation of the cumulative projects. The potential for increased risks of

larger spills and related environmental consequences are addressed in Chapter 4, *Environmental Health and Safety*.

Construction

As noted in Section Chapter 3, Section 3.12, *Tribal Resources*, the proposed action would be required to comply with water and air quality standards consistent with the permits described in Section 3.12. Therefore, construction of the proposed action would not likely result in the cumulatively substantial degradation of tribal resources.

Onsite Operations

As noted in Chapter 3, Section 3.12, *Tribal Resources*, the proposed action could affect tribal resources if operations were to degrade or limit access to resources used by the tribes, including the plants and fisheries described in Section 3.12. As described in Chapter 3, Sections 3.3, *Water*, 3.4, *Plants*, and 3.5, *Animals*, leaks and spills of petrochemicals from routine rail operations and associated maintenance already pose risks at the existing site. The risks would increase under the proposed action because of increased rail trips and facility operations. However, the potential increase of small spills would be slightly greater than under the no-action alternative, and is not expected to have any measurable impact on tribal resources, including water quality, aquatic habitat, or animals. Cumulative risks of incidents[20] are addressed Section 6.5.7, *Environmental Health and Safety*.

As further noted in Section 3.12, *Tribal Resources*, onsite routine operations would involve vessel-loading activities that would increase the occupancy of the Terminal 1 berth, which is a usual and accustomed fishing area of the Quinault Indian Nation fishers. Currently, tribal fishers deploy gillnets and drift with the tide, taking turns sweeping through segments of Grays Harbor that typically extend as far as Cosmopolis to the Crossover Channel Reach of the navigation channel (Chapter 3, Figure 3.12-1). This area includes the portion of the navigation channel in front of the Terminal 1 berth. Depending on its size, a docked vessel would occupy approximately 20 to 25% of the width of the channel.[21] While a vessel is at berth, fishers cannot extend fishing nets as far and cannot access the areas nearest the dock structure where fish are reported to concentrate (Quinault Indian Nation 2015: Exhibit E). When a vessel is docked, fishers must either shorten the duration of their drift to stop as they near the vessel or move farther out into the navigation channel to avoid the vessel. Lighting impacts from nighttime transfer operations may also affect fish behavior and harvest.

The most intensive fishing at the dock area is during the fall salmon management period from September to mid-November, when several fishing vessels may deploy drift gillnets near the Terminal 1 berth. Quinault Indian Nation fishers may also fish the area during other times of the year, deploying gillnets for winter steelhead and white sturgeon in spring and summer.

[20] *Incidents* refer to oil spills, explosions, or fires.

[21] The typical 550-class tank barge is approximately 600 feet long and a maximum of 78 feet wide and is assisted by a tug that is approximately 127 feet long and a maximum of 42 feet wide. A Panamax-class tanker has a maximum overall length of 950 feet and a maximum width of approximately 106 feet.

Cumulative vessel calls to Terminal 1 at maximum throughput would occupy the berth a maximum of 363 days per year[22] (Section 6.5.6, *Vessel Traffic*). During periods of maximum catch for Chinook, coho, or chum salmon, the fall fishery may be open 2 to 4 days per week. Assuming a 24-hour maximum berth occupancy and vessels evenly dispersed over the allowed harvest times, it is likely a vessel would be at the dock during a substantial portion of the fishery season. However, the potential of these vessels to affect treaty catch is dependent on how fish are distributed across the navigation channel relative to the remaining channel area available to treaty fishers.

Salmon concentrate next to the dock along Terminal 4 (Quinault Indian Nation 2015: Exhibit E); however, the navigation channel is narrower at Terminal 1 and salmon may be distributed differently at this location compared to the wider channel and adjacent shallow areas leading to the south channel at Terminal 4. Migration patterns of salmon in estuaries and rivers are complex. Hinch and Rand (2000) found evidence to suggest sockeye salmon were efficient at finding small reverse-flow vortices to increase swimming efficiencies during upstream migration. Generally, upstream-migrating salmon avoid fast water by swimming near the shore and near the bottom (Quinn 2005:80). Hughes (2004) hypothesized that Chinook salmon migrate further from the bank than sockeye to avoid wave drag caused by swimming close to the surface in shallow waters. However, all species may distribute similarly in the dredged and tidally influenced navigation channel.

Depending on the specific circumstances of each interaction (e.g., chance of a vessel calling during an open tribal fishing season, distribution of the fish, number of fishers on any given day), it is difficult to predict whether increased occupancy at Terminal 1 would substantially affect the tribe's usual ability to fish. While vessels could occupy the berth up to 100% of the time during the fall fishery, Quinault Indian Nation fishers would not have the option to fish along the dock. Fishers could have access to fish at other locations in Grays Harbor (such as other portions of the navigation channel, farther away from the shoreline or farther upstream), although opportunities to relocate during intense fishing periods may be limited if the other areas are occupied by fishers.

Docked vessels at other times of the year would likely have less impact because fewer fishers are participating in fish harvest. Fishers would, therefore, likely have more options to adjust their fishing efforts to other areas in Grays Harbor and the Chehalis River.

Rail

As noted in Chapter 3, Section 3.12, *Tribal Resources*, the proposed action could affect tribal resources along the PS&P rail line if rail operations were to degrade or limit access to resources used by the tribes, including the plants and fisheries described in Section 3.12. Because operation of the proposed action would be required to comply with water and air quality standards consistent with the permits described in Chapter 3, routine rail operations related to the proposed action would not likely result in the cumulatively substantial degradation of tribal resources. Cumulative risks of incidents are addressed in Section 6.5.7, *Environmental Health and Safety*. Additionally, as discussed in Section 3.12, access to tribal resources along the PS&P rail line would not be affected by rail operations related to the proposed action.

[22] Assumes all vessels are tank barges with a maximum 24-hour berth occupancy.

Vessel

As noted in Chapter 3, Section 3.12, *Tribal Resources*, the proposed action could affect tribal resources in Grays Harbor if vessel operations were to degrade or limit access to resources used by the tribes, including the plants and fisheries described in Section 3.12. Because operation of the proposed action would be required to comply with water and air quality standards consistent with the permits described in Chapter 3, routine vessel operations related to the proposed action would not likely result in the cumulatively substantial degradation of tribal resources. Cumulative risks of incidents are addressed in Section 6.5.7, *Environmental Health and Safety*.

As further noted in Section 3.12, vessel operations could disrupt access to usual and accustomed fishing areas if there are fishers in the navigation channel when a vessel is traveling to and from the project site. If the cumulative projects are approved, the number of vessels traveling in the navigation channel through usual and accustomed fishing areas would increase further compared to the existing conditions.[23]

Operation of the cumulative projects at maximum throughput would result in a maximum additional 758 tank vessel trips[24] per year through the navigation channel. These vessel trips would be added to an average[25] of 373 annual trips by tank and cargo vessels[26] associated with ongoing operations at the Port terminals (Section 6.5.6, *Vessel Traffic*). The total maximum vessel trips would be 1,180 when considering both the existing and the cumulative projects.

Because cumulative vessel traffic would be limited to the navigation channel (Chapter 3, Section 3.17, *Vessel Traffic*), impacts on tribal resources in Grays Harbor but outside the navigation channel are not expected. The cumulative projects would use Terminals 1 and 3, and would not affect drift and set-net gillnet fishers operating east of Terminal 1 and the turning basin, in the south channel near Markham, and in Area 2C (Chapter 3, Figure 3.17-5). Crab fishing grounds in Grays Harbor are outside of the navigation channel and access to those areas would not be affected by the increase in vessel traffic. Resources important to the Chehalis would also not be affected, because all tribal fishing occurs within the Chehalis Reservation.

Cumulative vessel trips would be most likely to conflict with tribal fishing during the fall salmon management period, when more fishers typically deploy drift gillnets in the navigation channel from the Crossover Channel Reach to the turning basin. During peak periods of the fall fishery, up to nine boats may be actively fishing this area and two to four fishers with nets deployed at one time (Quinault Indian Nation 2015:10). Increased vessel traffic would increase the chance that a vessel travelling through this area would disrupt tribal fishing.

As described in Section 3.17, *Vessel Traffic*, it takes approximately 2 hours for vessels to transit the navigation channel between the entrance buoy and Terminal 1. Favorable transit times for vessels related to the proposed action are close to high tide. Quinault Indian Nation fishers currently choose

[23] As noted in Chapter 3, Section 3.16, *Vessel Traffic*, the analysis in this Draft EIS considers the potential growth in vessel traffic unrelated to the proposed action over the 20-year analysis period (2017 to 2037). Projected traffic increases were based on growth rates used in the Grays Harbor Channel Deepening Project.
[24] A trip represents one-way travel.
[25] Annual average estimate over the 20-year analysis period.
[26] Tank vessels carry bulk liquids and consist of self-propelled tankers and tank barges. Cargo vessels carry grain, wood, and other dry projects. They consist of self-propelled cargo ships, cargo barges that require an escort tug, and RoRo vessels (roll-on/roll-off) that carry wheeled vehicles.

the high slack tide period for salmon drift gillnetting. Assuming the vessel is between the Crossover Channel Reach of the navigation channel and Terminal 1 for approximately half of the 2-hour transit time, including docking and undocking maneuvers, a vessel trip could disrupt fishing for a 1-hour period.

Transiting vessels related to the cumulative projects would affect (limit) the timing, duration, and physical area that could be fished. Depending on the specific circumstances of the interaction, this could affect the volume of a day's catch. Fishers may be able to compensate for lost fishing time by retrieving their net and motoring back to the start of the drift area; however, depending on factors such as the time of day and number of other fishers, it may not be practical to do so and the disruption could equate to lost fishing opportunities.

Cumulative vessel trips by large commercial vessels[27] are forecast to average 3.2 vessel trips per day over 20-year analysis period (Section 6.5.6, *Vessel Traffic*) compared to 1.1 trips per day without the cumulative projects. As described in Chapter 3, Section 3.17, *Vessel Traffic*, a vessel trip could disrupt fishing for a 1-hour period.[28] When a vessel is traveling through the area, tribal fishers would either avoid the area entirely (fish elsewhere) or cut their drifts short (pull the nets in sooner) to avoid conflicts with vessels. Fishers would continue to need to monitor radio communications for inbound and outbound vessel traffic and be prepared to retrieve fishing gear when a vessel is transiting the area. Under cumulative conditions, the potential for a 1-hour disruption could occur up to two more times on average per day.

Depending on the specific circumstances of the interaction, cumulative vessel trips could affect (limit) the timing, duration, and physical area that could be fished, which has the potential to affect the volume of a day's catch. Fishers may be able to compensate for lost fishing time by retrieving their net and motoring back to the start of the drift area; however, depending on factors such as the time of day and number of other fishers, it may not be practical to do so and the disruption could equate to lost fishing opportunities. Although it is difficult to predict whether the increased vessel traffic would result in an overall inability to meet the tribe's seasonal quota, increased traffic would limit access to usual and accustomed fishing areas with a greater potential to do so under cumulative conditions.

Increased vessel trips could also reduce access to the Quinault Indian Nation's ocean crab and marine fisheries by limiting the times when tribal fishers can cross the bar at the mouth of Grays Harbor and limiting access to the navigation channel, which tribal fishers prefer to use when transporting catch into the harbor. Although laden tank vessels are anticipated to transit out of the harbor during high tide, inbound vessels in ballast could transit the navigation channel at any time. To lessen the danger of hazardous conditions during incoming or outgoing tides, bar crossings are often timed during slack high or low tides. It is likely this disruption would not be substantial because smaller Quinault Indian Nation fishing vessels would be able to maneuver around and avoid the transiting tanker vessels.

Quinault Indian Nation fishers participating in the Dungeness crab fishery inside Grays Harbor would not be affected by cumulative vessel trips because they operate outside the navigation channel and monitor marine communications to avoid larger vessels when transiting to fishing grounds.

[27] The term *large commercial vessels* refers collectively to tank and cargo vessels.

[28] The following navigation rules (Inland Navigation Rules, Rules 9, 13, and 18) apply to the navigation channel.

6.5.3.3 Mitigation Measures

Implementation of the applicant mitigation measures identified in Section 3.12, *Tribal Resources*, and repeated below, would reduce cumulative impacts.

- To mitigate potential impacts on tribal fishing, the applicant will coordinate with the Quinault Indian Nation and Washington Department of Fish and Wildlife, as requested, to support review and possible adjustments of docking schedules to minimize conflict with fishing schedules negotiated preseason by the state and tribe. Consultation will account for operations, including anticipated vessel movements related to the proposed action.
- While tribal fishing boats are required to follow the U.S. Coast Guard navigation rules, to improve awareness of vessel traffic in the navigation channel, the applicant will work with the Grays Harbor Safety Committee, including the U.S. Coast Guard and Port of Grays Harbor, to establish procedures to announce project related vessel traffic arrivals and departures over a designated very high frequency (VHF) marine radio channel.
- To mitigate impacts on access to tribal treaty fishing areas, the applicant will initiate a process between stakeholders and Quinault Indian Nation tribal officials to discuss and identify additional mitigation measures such as, the adjusting the timing of vessel calls during peak fishing seasons. Initiation of the process between the parties will occur before the proposed vessel operations begin.

6.5.3.4 Unavoidable and Significant Adverse Environmental Impacts

The cumulative projects would affect tribal resources. Implementation of the mitigation measures described above would reduce but may not eliminate impacts on tribal resources. More specifically, vessels related to the proposed action would travel through usual and accustomed fishing areas in Grays Harbor. Under current and future conditions, increased vessel traffic could restrict access to tribal fishing areas in the navigation channel or at Terminal 1. This conflict is most likely to occur for fishing related to harvest of salmon, steelhead, and sturgeon. Because other factors besides vessel operations affect fishing opportunities, such as the number of fishers, fish distribution, timing, and duration of fish windows, the extent to which vessel operations related to the proposed action would affect tribal fishing is difficult to quantify. No mitigation measures would completely eliminate the possibility of impacts to fishing resources as a result of vessel operations related to the proposed action.

6.5.4 Rail Traffic

This section discusses potential cumulative impacts on rail traffic that would result from construction and operation of the cumulative projects.

6.5.4.1 Study Area

The cumulative impacts study area for rail traffic consists of the PS&P rail line between Centralia and the project sites, including the PS&P junction with the BNSF main line in Centralia that could be affected during rail transport.

6.5.4.2 Cumulative Impacts

The following section describes the rail traffic, capacity, and grade-crossing occupancy impacts that could result from the routine operation of the cumulative projects. Cumulative impacts are not anticipated for construction of the cumulative projects.

Rail Traffic

Cumulative rail traffic from the cumulative projects, including baseline rail traffic, would equal approximately 7.35 trips[29] per day and 2,788 trips annually on the PS&P rail line. Table 6-9 summarizes the anticipated trips for the cumulative projects.

Table 6-9. Average Unit Train[a] Trips—Cumulative Projects

Project	Daily	Weekly	Annual
Westway Project	1.25	8.75	458
Imperium Project	2	14	730
Grays Harbor Rail Terminal Project	1	7	365
Existing traffic	3.1	23.8	1,235
Total	**7.35**	**53.5**	**2,788**

[a] Assumes 120-car unit trains (1.25 miles in length).

Capacity for Additional Trains

Based on simulation modeling (Chapter 3, Section 3.15, *Rail Traffic*), the PS&P rail line currently has the capacity to handle up to 12 trips per day, although, as with the existing traffic, delays along the rail line may occur. Current rail traffic along the PS&P rail line is approximately 3 trips per day. The addition of approximately 4.25 trips per day between Centralia and the project site can be accommodated without any improvements to the existing rail line.

Grade-Crossing Occupancy Times

Increased rail traffic along the PS&P rail line related to the cumulative projects would increase how often trains delay traffic at grade crossings (grade-crossing occupancy times).

The far-right column of Table 6-10 lists the average daily grade-crossing occupancy time at selected grade crossings between Centralia and east Aberdeen for all rail traffic (existing trains and trains from the cumulative projects) compared to the no-action alternative. These grade crossings are among those with the highest average daily traffic in the rail corridor (the other grade crossings are in Aberdeen).

[29] A trip represents one-way travel; in other words, an inbound trip and an outbound trip are counted as two trips.

Table 6-10. Average Daily Occupancy Time [a] at Selected Grade Crossings between Centralia and East Aberdeen—Cumulative Projects

Grade Crossing	Milepost	Location	No-Action Alternative	Cumulative Projects plus No-Action Alternative
Tower Street (SR 507)	0.82	Centralia	26 minutes	1 hour 8 minutes
Pearl Street (SR 507)	0.89	Centralia	26 minutes	1 hour 8 minutes
West Reynolds Street	2.14	Centralia	17 minutes	53 minutes
Old Highway 99 SW	6.07	Unincorporated Thurston County	8 minutes	30 minutes
Monte Elma Road	51.98	Satsop	7 minutes	23minutes

[a] Occupancy times rounded to the nearest minute.

As described in Section 3.15, *Rail Traffic*, train occupancy times are most severe in Aberdeen due to switching operations related to Poynor Yard. Table 6-11 illustrates the maximum daily occupancy times for all trains (existing trains from the cumulative projects) compared to the no-action alternative at selected grade crossings in Aberdeen.

Table 6-11. Maximum Daily Occupancy Time[a] at Selected Grade Crossings in Aberdeen—Cumulative Projects

Grade Crossing	No-Action Alternative	Cumulative Projects plus No-Action Alternative
Fleet Street	37 minutes	45 minutes
East Heron Street	44 minutes	52 minutes
Port Industrial Road	9 minutes	58 minutes
West 1st Street	7 minutes	1 hour 7 minutes
Industrial Road	13 minutes	1 hour 17 minutes

[a] Occupancy times rounded to the nearest minute.

Unit train trips would increase the maximum train occupancy times at all grade crossings in Aberdeen. For example, the maximum train occupancy time at West 1st Street would increase by 1 hour. The increase in occupancy times at the grade crossings east of Poynor Yard would be from switching operations to build up departing trains at and east of the Poynor Yard. The increase in train occupancy times at the grade crossings west of Poynor Yard would be from arriving trains and switching operations to break down trains at the west of Poynor Yard.

Unit train trips for the cumulative projects would also increase the frequency of trains occupying grade crossings in Aberdeen. Table 6-12 illustrates the average daily train occupancy time at selected grade crossing for all trains (existing trains and trains from the cumulative projects). Appendix L, *Vehicle Traffic Analysis*, provides the daily occupancy time at all grade crossings.

Table 6-12. Average Daily Train Occupancy Time[a] at Selected Grade Crossings

Grade Crossing	No-Action Alternative	Cumulative Projects plus No-Action Alternative
Fleet Street	49 minutes	2 hours 38 minutes
East Heron Street	1 hour 10 minutes	3 hours 16 minutes
Port Industrial Road	14 minutes	1 hour 58 minutes
West 1st Street	17 minutes	2 hours 19 minutes
Industrial Road	43 minutes	3 hours 23 minutes

[a] Occupancy times rounded to the nearest minute.

The additional trains from the cumulative projects would substantially increase the average daily occupancy at grade crossings in Aberdeen. For example, the average daily train occupancy time at the East Heron Street grade crossing is currently 1 hour and 10 minutes from grain, auto, and mixed carload freight trains. With existing trains and additional trains from the cumulative projects, the average daily train occupancy time at East Heron Street would increase to 3 hours and 16 minutes.

6.5.4.3 Mitigation Measures

Impacts on rail traffic resulting from the cumulative projects are considered low and would not necessitate mitigation beyond the minimum requirements specified by applicable laws and regulations. Section 3.16, *Vehicle Traffic and Safety*, addresses mitigation measures for vehicle delay impacts at grade crossings. Chapter 4, *Environmental Health and Safety*, addresses rail safety mitigation measures.

6.5.4.4 Unavoidable and Significant Adverse Environmental Impacts

The cumulative projects would result in an increase in blocked grade crossings; however, there would be sufficient capacity to accommodate this increase in rail traffic. There would be no unavoidable and significant adverse impacts. Mitigation to address vehicle traffic and safety impacts from increased rail traffic is addressed in Section 3.16, *Vehicle Traffic and Safety*.

6.5.5 Vehicle Traffic and Safety

This section discusses potential cumulative impacts on vehicle traffic and safety that would result from construction and operation of the cumulative projects.

6.5.5.1 Study Area

The cumulative impacts study area for vehicle traffic and safety consists of the roadways and intersections near the project sites that could be affected by increased vehicle traffic from construction and operation of the cumulative projects. The study area also includes grade crossings between Hoquiam and Centralia that could be affected by increased rail traffic.

6.5.5.2 Cumulative Impacts

The following section describes the vehicle traffic and safety impacts that could result from the construction and routine operation of the cumulative projects.

Onsite Construction and Operations

Construction and operation of the cumulative projects would generate traffic to and from each project site during construction. The estimated daily construction vehicle trips generated for the Westway project and Imperium project are presented in Table 6-13. The Grays Harbor Rail Terminal project operations would also generate vehicle trips on area roadways. However, the project site is located at Terminal 3 approximately 3 miles to the west of the Imperium and Westway project sites. Any Grays Harbor Rail Terminal project construction traffic in the Terminal 1 area including Industrial Road would have negligible impacts on vehicle delay.

Table 6-13. Estimated Daily Construction Vehicle Trips—Westway and Imperium Projects

Project	Estimated Number of Employees	Approximate Number of Vehicle Trips per Day
Westway Project		
Phase 1	86	172
Phase 2	49	98
Imperium Project		
Phase 1	76	152
Phase 2	110	220

Up to approximately 196 construction workers could access the project sites (Phase 1 of Westway project and Phase 2 of Imperium project). This would generate approximately 392 construction vehicle trips each day, or approximately 7% of the average daily traffic on Industrial Road. This increase in traffic would be temporary and limited to the construction period. Construction vehicles would park at or near the projects sites in the Port area and would not affect vehicle delay on Industrial Road.

After construction, approximately 160 trips would be generated daily at the project sites (approximately 100 trips with Westway project and 60 trips with Imperium project, assuming two trips per day per employee). This increase in employee vehicle trips would result in approximately 3% increase in average daily traffic on Industrial Road near the project sites. This increase is minimal compared to existing traffic conditions and would not result in a decrease to the level of service (LOS) designation on Industrial Road.

Rail

The following section describes vehicle traffic and safety impacts that could occur as a result of additional rail traffic from the cumulative projects.

Vehicle Delay

Rail traffic from the cumulative projects, including baseline train traffic, would equal approximately 25 trips per day, which would increase the number of train trips on the PS&P rail line by an average of approximately 4.25 trips per day. Motorists, including emergency vehicle operators, would experience delays and an increase in vehicle delay at grade crossings.

Average Vehicle Delay

Increased rail traffic along the PS&P rail line related to the cumulative projects would increase average vehicle delay. However, for the majority of the PS&P rail line grade crossings, the increase in blockage time would not result in a decline in the LOS because the average daily traffic for a majority of grade crossings is low. Sixty of the 81 public grade crossings have average daily traffic of fewer than 900 vehicles.

The approximate total vehicle delay in 2017 in a 24-hour period for grade crossings between west of Centralia and east of Aberdeen would vary from approximately 19 to 56 minutes daily, depending on the grade crossing, compared to 7 to 17 minutes under the no-action alternative. Therefore, the total blockage time at grade crossings due to the cumulative project trains would increase by approximately 12 to 39 minutes in a 24-hour period. Even though there would be an increase in total daily vehicle delay, an increase in train trips on the PS&P rail line would not substantially increase the average vehicle delay at most PS&P rail line grade crossings compared to the no-action alternative. This is because vehicle traffic along most of the PS&P rail line is relatively low and the chance of a substantial number of vehicles encountering a train would remain relatively low. In other words, most individual drivers would not likely notice a substantial change in delay at grade crossings.

However, the total blockage time would be greater in Centralia and Aberdeen. As shown in Table 6-10 in Section 6.5.4, *Rail Traffic*, the Tower Street and Pearl Street grade crossings in Centralia would be blocked for approximately 1 hour and 8 minutes each day compared to 26 minutes under the no-action alternative. Aberdeen would also experience increases in delay as shown in Table 6-11. For example, the Port Industrial Road grade crossing would be blocked for 1 hour and 58 minutes compared to 14 minutes under the no-action alternative.

Table 6-14 summarizes the average vehicle delay in 2017 at the grade crossings with the highest average daily traffic.[30] Appendix L, *Vehicle Traffic Analysis*, provides the average vehicle delay at all grade crossings in 2017. Because these grade crossings have the highest average daily traffic, vehicles at these crossings have the highest probability to experience vehicle delay.

[30] See Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, for the methods used to determine average vehicle delay and corresponding LOS.

Table 6-14. Level of Service (Average Vehicle Delay) at Selected Grade Crossings (2017)

Grade Crossing	Milepost	Location	Approximate 2017 Average Daily Traffic	No-Action Alternative	Cumulative Projects plus No-Action Alternative
Tower Street (SR 507)	0.82	Centralia	8,025	A	B
Pearl Street (SR 507)	0.89	Centralia	13,755	A	B
West Reynolds Street	2.14	Centralia	6,380	A	A
Old Highway 99 SW	6.07	Unincorporated Thurston County	10,160	A	A
Monte Elma Road	51.98	Satsop	4,770	A	A
Tyler Street	68.23	Aberdeen	4,050	B	F
South Chehalis Street	68.36	Aberdeen	4,905	C	F
Port Industrial Road	70.06	Aberdeen	17,845	A	D
West 1st Street	70.41	Aberdeen	4,625	A	E
Industrial Road	71.04	Aberdeen	5,795	B	F

As shown in Table 6-14, grade crossings in Aberdeen (Olympic Gateway Plaza area and the Port of Grays Harbor area) would experience the most substantial increase in average vehicle delay with the addition of cumulative project trains on the PS&P rail line. All grade crossings that would operate at or below LOS D in 2017 are in Aberdeen. These grade crossings are in two general areas.

- **Olympic Gateway Plaza area.** As illustrated in Figure 6-5, average vehicle delay would worsen at the Olympic Gateway Plaza compared to the no-action alternative. As described in Section 3.15, *Rail Traffic*, existing train-building activities at the Poynor Yard require eastbound trains to extend across the Wishkah River bridge and block grade crossings in the Olympic Gateway Plaza area. The additional trains from the cumulative projects would lengthen the average vehicle delay at these grade crossings. LOS at the East Heron Street and Newell Street grade crossings, the western-most grade crossings in the Olympic Gateway Plaza area, would degrade from LOS D to LOS F. The grade crossings east of Newell Street at the Olympic Gateway Plaza area would degrade from LOS B or C to LOS E or F.
- **Port of Grays Harbor area.** As illustrated in Figure 6-6, the West 1st Street, North Maple Street, and Industrial Road grade crossings would operate at LOS E or F. These grade crossings would operate at LOS A or B under the no-action alternative. The Port Industrial Road and West 1st Street grade crossings would operate at LOS D.

Figure 6-5. 2017 Cumulative Vehicle Delay at Selected Grade Crossings East of Poynor Yard

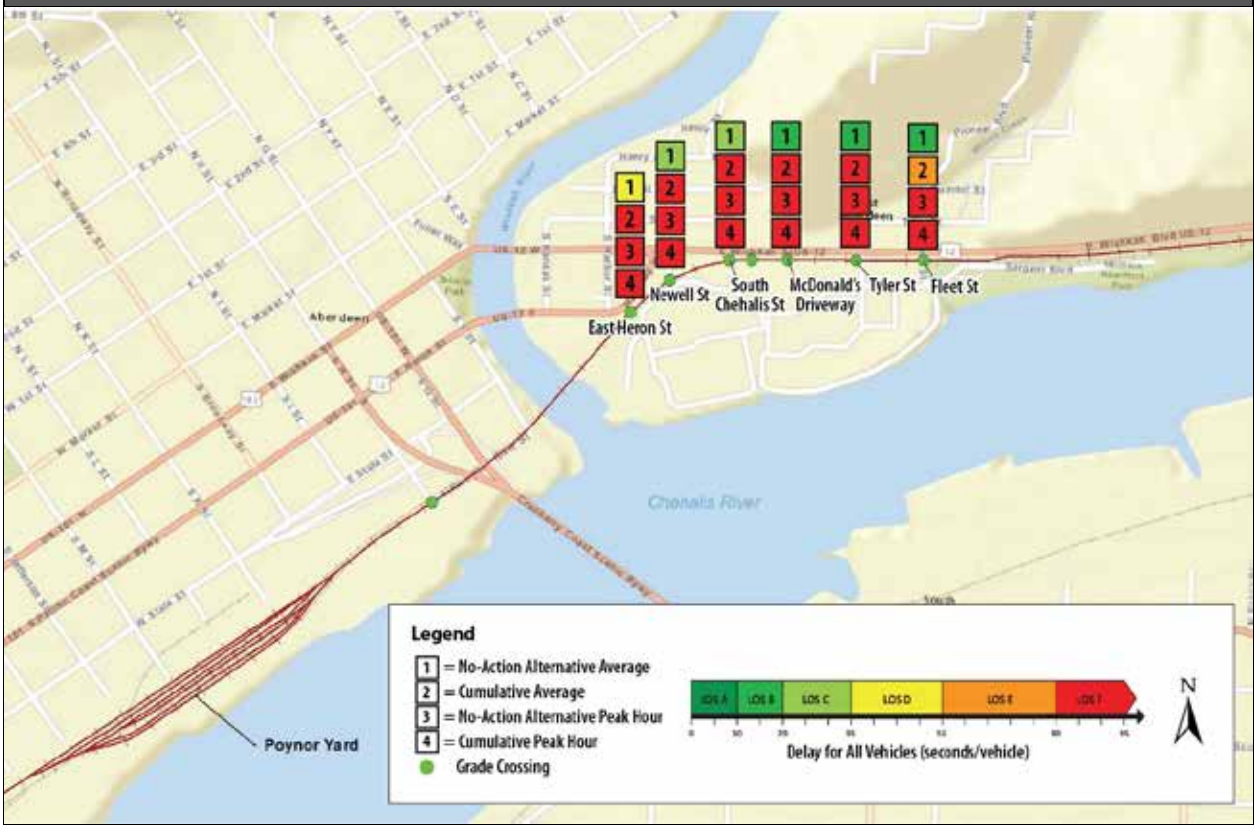
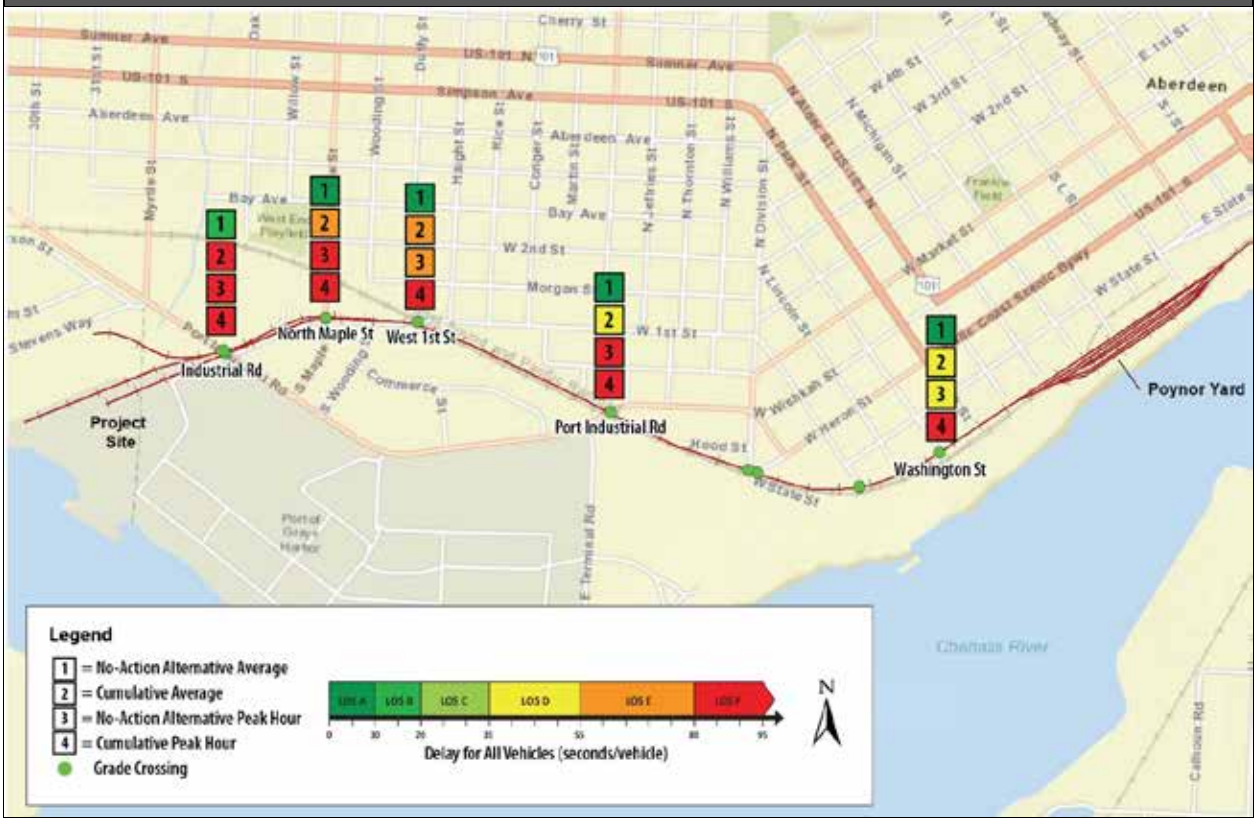


Figure 6-6. 2017 Cumulative Vehicle Delay at Selected PS&P Line Crossings West of Poynor Yard



As noted in Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, this analysis represents a conservative analysis for the average vehicle in 2017 because the analysis is based on the following assumptions.

- **Maximum throughput.** The cumulative projects would begin full throughput operations of an average of 4.25 trips (maximum throughput) per day in 2017.
- **No trip diversion**. The vehicle delay analysis did not consider trip diversion (alternative routes for automobile traffic). Including trip diversion in the analysis would likely indicate shorter average vehicle delays at the Port area grade crossings because at some locations other routes would avoid crossing the PS&P rail line.
- **No planned rail infrastructure.** New infrastructure implemented in 2017 that could provide for increased train speeds (Chapter 3, Section 3.15, *Rail Traffic*) could reduce vehicle delay at grade crossings. Infrastructure improvements were not included in the analysis.
- **Most impactful switching operations for Imperium Project**. Switching operations for the Imperium projects assumes that PS&P would deliver rail cars to the project site in the most cost- and time-efficient manner. This method would increase the time that Imperium project trains would block the grade crossing between Poynor Yard and the Imperium project site.

Because the population is forecasted to grow, vehicle traffic volumes at the grade crossings will increase over time. Table 6-15 summarizes the predicted average vehicle delay at the grade crossings with the highest average daily traffic in 2037. Appendix L, *Vehicle Traffic Analysis*, provides the average vehicle delay at all grade crossings in 2037. Because these grade crossings have the

highest average daily traffic, vehicles at these grade crossings have the highest probability to experience vehicle delay at grade crossings.

Table 6-15. Level of Service (Average Vehicle Delay) at Selected Grade Crossings (2037)

Grade Crossing	Mile-post	Location	Approximate 2037 Average Daily Traffic	No-Action Alternative	Cumulative Projects plus No-Action Alternative
Tower Street (SR 507)	0.82	Centralia	10,375	A	B
Pearl Street (SR 507)	0.89	Centralia	17,790	A	B
West Reynolds Street	2.14	Centralia	8,250	A	A
Old Highway 99 SW	6.07	Unincorporated Thurston County	13,135	A	A
Monte Elma Road	51.98	Satsop	6,170	A	A
Tyler Street	68.23	Aberdeen	5,235	A	D
South Chehalis Street	68.36	Aberdeen	6,345	B	D
Port Industrial Road	70.06	Aberdeen	23,075	A	E
West 1st Street	70.41	Aberdeen	5,980	A	E
Industrial Road	71.04	Aberdeen	7,495	B	F

Similar to 2017 conditions, all grade crossings that would operate below LOS D in 2037 along at grade crossings are in Aberdeen.

- **Olympic Gateway Plaza area.** As described in Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, the average vehicle delay would decrease over the 20-year analysis period in east Aberdeen (Olympic Gateway Plaza area) because of infrastructure improvements to the Wishkah River bridge that would allow speeds to increase from 10 to 20 miles per hour. Trains would move through grade crossings faster, thereby reducing vehicle delay at east Aberdeen grade crossings. LOS would improve at all the grade crossings between South Chehalis Street and Fleet Street grade crossings with the increase in speeds. In addition, future roadway improvements could further improve congestion and improve LOS in the Port and surrounding area. For example, possible options to alleviate congestion along US Route 12 (US 12) in Aberdeen related to the East Aberdeen Mobility Project are under consideration, including the creation of grade-separated crossings; however, because a preferred alternative has not yet been determined and funding has not been identified, this project was not considered in transportation modeling.
- **Port of Grays Harbor area.** All grade crossings between Port Industrial Road and the Imperium and Westway project sites would operate at LOS E or F indicating substantial delay for the average vehicle. Port Industrial Road would degrade from LOS D to E between 2017 and 2037 due to the forecasted traffic growth over the 20-year period.

Peak Hour Vehicle Delay

To describe the greatest impacts that could occur under cumulative conditions, an analysis of vehicle delay during the peak traffic hour was completed. The peak traffic hour is the hour of the day when the highest number of vehicles travel study area roads. The peak hour vehicle delay assumes the longest train under cumulative conditions would operate during the peak hour. Because unit trains related to the cumulative projects would have the same number of rail cars and would be longer than existing trains, the cumulative vehicle delay would be the same as the proposed action, as presented in Section 3.16, *Vehicle Traffic and Safety*. Table 6-16 summarizes peak hour vehicle delay at the grade crossings with the highest average daily traffic.

Table 6-16. Level of Service (Peak Hour Vehicle Delay) at Selected Grade Crossings (2017)

Grade Crossing	Milepost	Location	No-Action Alternative	Cumulative Projects plus No-Action Alternative
Tower Street (SR 507)	0.82	Centralia	F	F
Pearl Street (SR 507)	0.89	Centralia	F	F
West Reynolds Street	2.14	Centralia	C	D
Old Highway 99 SW	6.07	Unincorporated Thurston County	C	D
Monte Elma Road	51.98	Satsop	A	B
Tyler Street	68.23	Aberdeen	F	F
South Chehalis Street	68.36	Aberdeen	F	F
Port Industrial Road	70.06	Aberdeen	F	F
West 1st Street	70.41	Aberdeen	E	F
Industrial Road	71.04	Aberdeen	F	F

The peak hour vehicle delay would be most substantial in Centralia and Aberdeen. In Aberdeen, rail operations on the PS&P rail line are heavily influenced by activities related to Poynor Yard, as described in Section 6.5.4, *Rail Traffic*. Peak hour vehicle delay can be summarized as follows.

- Centralia: Similar to the no-action alternative, the Tower Street and Pearl Street grade crossings would operate at LOS F. The H Street grade crossing would operate at LOS E.
- Olympic Gateway Plaza area: Similar to the no-action alternative, all grade crossings would operate at LOS F (Figure 6-5).
- Port of Grays Harbor area: All grade crossings would operate at LOS F (Figure 6-6).

Therefore, in Aberdeen, the peak hour analysis concluded substantial vehicle delay, with all grade crossings operating at LOS F, from the eastern end of the Olympic Gateway Plaza (Fleet Street) to the Port of Grays Harbor area.

Queueing

Increases to existing traffic delays would occur with an average of 4.25 new rail trips on the PS&P rail line with the cumulative projects. Increased vehicle delay from trains blocking grade crossings would have secondary impacts on nearby intersections. As vehicles begin to queue while waiting for the grade crossing to open, increased roadway congestion can affect upstream intersections. Table 6-17 illustrates the grade crossings that would have queues exceeding available storage length in 2017, as well as the increase in the queue length in number of cars compared to the no-action alternative.

Table 6-17. Average Queue Lengths Exceeding Available Storage Capacity at Grade Crossings—Cumulative Projects (2017)

Grade Crossing	Queue Direction	Queue Location	Increase in Average Queue Length (Number of Cars)[a]
Centralia			
Tower Street (SR 507)	Northbound	SR 507 northbound couplet in central Centralia. Upstream affected intersection is 4th Street.	8
Pearl Street (SR 507)	Southbound	SR 507 southbound in central Centralia. Upstream affected intersection is 6th Street.	23
East Aberdeen/Olympic Gateway Plaza Area[b]			
Fleet Street	Northbound	Exit from Olympic Gateway Plaza at US 12.	8
Tyler Street	Northbound	Exit from Olympic Gateway Plaza at US 12.	9
Chehalis Street	Northbound	Exit from Olympic Gateway Plaza at US 12.	14
Newell Street[c]	Northbound	Exit from Olympic Gateway Plaza at US 12.	1
East Heron Street	Eastbound Right-Turn Lane	Right-turn from US Route 12 eastbound to Olympic Gateway Plaza. Upstream affected intersection is South F Street.	15
Port of Grays Harbor Area[b]			
Port Industrial Road[c]	Eastbound and Westbound	Adjacent to applicant's project site. Upstream affected intersection is South and Myrtle Street (Eastbound) and Maple Street (westbound).	25 (eastbound) 33 (westbound)
West 1st Street[c]	Eastbound and Westbound	East of the project site and Port Industrial Road. Upstream affected intersection is Maple Street (eastbound) and Haight Street (westbound).	13 (eastbound) 17 (westbound)
Industrial Road [c]	Eastbound and Westbound	Adjacent to applicant's project site in Port of Grays Harbor area.	35 (eastbound) 37 (westbound)

[a] Increase in average queue length compared to the no-action alternative. Assumes 20 feet per car. For example, the cumulative average queue length at Fleet Street would be 160 feet longer than the no-action alternative.
[b] Grade crossing location shown on Figures 6-5 and 6-6.
[c] Would not exceed available storage length under the no-action alternative. All other grade crossings exceed available storage length under the no-action alternative.

Table 6-17 illustrates that, for average queue lengths at the Tower Street and Pearl Street grade crossings in central Centralia, five of the seven Olympic Gateway Plaza area grade crossings and three of the Port area grade crossings would be longer for cumulative conditions than for the no-action alternative. Three intersections would not exceed available storage length under the no-action alternative.

The queue lengths would be substantial at most intersections shown in Table 6-17. In the Port area, the queue lengths would result from switching operations between Poynor Yard and the Imperium and Westway project sites, which would increase both the frequency and duration of blocked grade crossings. Table 6-12 in Section 6.5.4, *Rail Traffic,* illustrates the average daily train occupancy time at selected grade crossings under cumulative conditions. This increase in the average daily train occupancy time would increase vehicle queue lengths.

In the Olympic Gateway Plaza area, queues at the grade crossings at the Olympic Gateway Plaza would extend into the plaza parking area, except at East Heron Street, where queues would extend onto US 12 eastbound. The grade crossing at East Heron Street conflicts with Olympic Gateway Plaza traffic traveling eastbound on US 12, and serves as a bottleneck. During an eastbound train event, the queue would extend past F Street (upstream intersection) on the west side of the Wishkah River. Similar to the vehicle delay analysis, the queuing analysis did not consider trip diversion. Including trip diversion in the analysis would likely indicate shorter average queue lengths at the Port area because there are other routes to avoid the grade crossings.

Average queue lengths in 2037 would increase compared to 2017 queue lengths due to the increase in traffic over the 20-year period. Average queue lengths would also increase compared to no-action alternative conditions because of the blockage time associated with the cumulative project trains along the PS&P rail line. The grade crossings that would exceed the available storage length in 2037 would be the same as 2017 (Table 6-17). Appendix L, *Vehicle Traffic Analysis*, illustrates queue lengths at all study intersections. The following summarizes 2037 queue lengths.

- **Centralia.** Queue lengths at Pearl Street and Tower Street grade crossings in Centralia and the Port would grow by approximately 30% between 2017 and 2037.
- **Olympic Gateway Plaza area.** Queue lengths at grade crossings in the Olympic Gateway Plaza area in east Aberdeen would increase by approximately 10% between 2017 and 2037. The analysis assumed rail infrastructure improvements would improve train speeds in this area and reduce the amount of time trains occupy grade crossings in east Aberdeen by 2037.
- **Port of Grays Harbor area.** Queue lengths at the Port Industrial Road, West 1st Street, and Industrial Road grade crossings would increase by approximately 30% between 2017 and 2037.

Solutions being evaluated by ongoing regional planning efforts (such as the East Aberdeen Mobility Project) would alleviate some of the vehicle delay impacts related to the cumulative projects if such improvements are funded and implemented by 2037. Further regional efforts to evaluate the potential for additional storage capacity would also help to mitigate increased delay at those locations.

Vehicle Safety

Increased rail traffic related to the cumulative projects could increase the frequency of accidents along the PS&P rail line compared to the no-action alternative. The magnitude of the increase would be determined by the volume of train traffic and average daily traffic. The impacts on grade-crossing

safety specific to each grade crossing for accidents involving trains and vehicles are summarized in Appendix L, *Vehicle Traffic Analysis.* This appendix provides the total predicted accident rate, predicted intervals between accidents, and the decrease in years between the predicted intervals in the analysis year (2017 or 2037) for all grade crossings along the PS&P rail line.

In 2017, the grade crossings that would have the shortest predicted intervals between accidents would be in Aberdeen because rail operations east of the Poynor Yard (Olympic Gateway Plaza area) and west of the Poynor Yard (the Port and surrounding area) would increase the frequency of train passbys at these grade crossings. As with vehicle delay, accident frequencies could improve by 2037 for some grade crossings if improvements such as grade-crossing protections are implemented. Additionally, although infrastructure improvements considered for the East Aberdeen Mobility Project were not included in the safety analysis, any improvements would likely lessen delay and improve safety at grade crossings in the Olympic Gateway Plaza area.

The *Railroad-Highway Grade Crossing Handbook–Revised Second Edition* (Federal Railroad Administration 2007) indicates that active devices with automatic gates should be considered when certain criteria are met. One criterion is if the expected accident frequency, as calculated by the U.S. Department of Transportation Accident Prediction formula, exceeds 0.075. As shown in Appendix L, *Vehicle Traffic Analysis*, no grade crossings would exceed this frequency using this formula.

Emergency Access

As described in the vehicle delay analysis, average vehicle and peak hour delay would increase with the additional trains resulting from the cumulative projects. Because vehicle delay would increase, emergency vehicle delay would also increase at grade crossings. The following sections describe the impacts on emergency vehicle access, focused on the PS&P rail line between Centralia and Aberdeen, in Centralia, and in Aberdeen (Olympic Gateway Plaza and Port of Grays Harbor areas).

Between Centralia and Aberdeen

For the grade crossings between west Centralia and east Aberdeen, the average vehicle delay from rail traffic from the cumulative projects would increase compared to the no-action alternative. The cumulative projects would add an average of 4.25 unit train trips per day. The projected 2017 cumulative daily grade-crossing delay for all trains between west of Centralia and east of Aberdeen would be between approximately 19 and 56 minutes daily compared to between 7 and 17 minutes under the no-action alternative. (Appendix L, *Vehicle Traffic Analysis*, provides daily grade crossing blockage times for all grade crossings.) Therefore, the average delay at the grade crossings would increase 12 to 39 minutes in a 24-hour period from the additional trains from the cumulative projects.

These trains would affect emergency response times if an emergency vehicle were blocked at a grade crossing occupied by a train for one of the cumulative projects. The potential for the cumulative projects to affect emergency response would also depend on whether the dispatched emergency vehicle would need to cross the PS&P rail line and the availability of alternative routes if a train were to occupy the grade crossing at the time of the call. Because the frequency of train traffic on the PS&P rail line would increase, the probability of an increase in emergency response time at these grade crossings would also increase. This impact would occur when an emergency vehicle experienced a delay related to a train for the cumulative projects.

Olympic Gateway Plaza Area (Aberdeen)

All grade crossings in the Olympic Gateway Plaza area (from East Heron Street to Fleet Street) are occupied for more than 35 minutes on average 3.9 times per week from eastbound grain and auto trains under the no-action alternative. Adding eastbound trains from the cumulative projects, these grade crossings would be occupied for more than 35 minutes on average 15.4 times per week.

Vehicle delays in the Olympic Gateway Plaza area are currently substantial because the seven grade crossings at the plaza provide the only vehicular emergency access to and from the plaza and Morrison Riverfront Park, immediately east of the plaza. With all cumulative projects, emergency response vehicles would experience more frequent and longer delays to access the Olympic Gateway Plaza area because there is no alternate roadway access to the plaza. Section 3.16*, Vehicle Traffic and Safety*, identifies applicant mitigation for emergency vehicle access to reduce the impact of a proposed action train on emergency response to this area.

Port of Grays Harbor Area (Aberdeen)

Vehicular access west of Poynor Yard and south of the PS&P rail line would be completely blocked on the existing roadways during train transits for the cumulative projects. Emergency vehicle access blockage would be affected in two areas, described as follows.

- **Between Poynor Yard and East of Port Industrial Road.** West of Poynor Yard and east of Port Industrial Road are the Washington Street, Monroe Street, Heron Street, and Division Street grade crossings. These grade crossings would be blocked for approximately 24 minutes when a Westway project train arrives (average of 0.6 times per day), and 51 minutes when an Imperium project train arrives (average of 1.0 time per day), compared to between 4 and 8 minutes, depending on train type, under the no-action alternative.
- **Between Port Industrial Road and the project sites.** All land uses south of the PS&P rail line between the Port Industrial Road grade crossing and the project site, including Home Depot and the Port, would be blocked from lands north of the PS&P rail line for between approximately 10 minutes and 33 minutes when a Westway project train and arrives (average of 0.6 times a day), and between 58 minutes and 1 hour 17 minutes when an Imperium project train arrives (average of 1.0 time a day). The Port Industrial Road grade crossing would be the first grade crossing that would open to provide vehicular access to this area. The Industrial Road grade crossing would the last grade crossing that would open to provide vehicular access to this area. This blockage of all grade crossings and the isolation of these land uses would substantially affect emergency response in this area.

6.5.5.3 Mitigation Measures

Rail traffic from the cumulative projects would substantially affect vehicle delays at grade crossings, emergency vehicle access, and accident frequency. Implementation of the applicant mitigation measures identified in Section 3.16, *Vehicle Traffic and Safety*, and repeated below, would reduce cumulative impacts.

- To mitigate vehicle traffic impacts associated with rail operations of the proposed action, the applicant will work with the City of Hoquiam, City of Aberdeen, the Port, Grays Harbor Council of Governments, and PS&P to address vehicle delay and/or inform motorists of potential blockages at PS&P crossings between the project site and Poynor Yard. The Washington State Department of Transportation, City of Hoquiam, City of Aberdeen, and Port will approve

proposed measures for the areas where they are responsible for vehicle safety. The applicant will ensure measures are in place prior to beginning the proposed operations. The proposed changes should include an evaluation of impacts on potentially affected low-income and minority populations.

- To mitigate vehicle traffic impacts associated with rail operations related to the proposed action, the applicant will work with the City of Hoquiam, City of Aberdeen, the Port, Grays Harbor Council of Governments, and PS&P to address vehicle delays and/or inform motorists of potential blockages at PS&P grade crossings into and out of the Olympic Gateway Plaza. The Washington State Department of Transportation, City of Hoquiam, City of Aberdeen, and Port will approve proposed measures for the areas where they are responsible for vehicle safety. The applicant will ensure acceptable measures are in place prior to beginning the proposed project operations. The proposed changes should include an evaluation of impacts on potentially affected low-income and minority populations.
- To reduce the potential for increased delay of emergency vehicles at PS&P grade crossings during project operations, the applicant will work with local emergency service providers to provide advance notification of incoming trains.
- To ensure that local emergency service providers have access to areas south of the PS&P rail line in Aberdeen, the applicant will ensure an automobile with an 8-foot clearance and a combination truck (pumper and ambulance) are available for staging south of the PS&P rail line in the Olympic Gateway Plaza for use by local emergency service providers. The applicant will also ensure an ambulance is available for staging south of PS&P rail line in the Port of Grays Harbor area between the project site and Port Industrial Road for use by emergency service providers. These measures will be in place prior to beginning crude oil operations.
- To address the potential for emergency access conflicts to areas along the PS&P rail line during unplanned unit train stoppages, the applicant will work with PS&P and local emergency service providers along the PS&P rail line to develop and implement a notification protocol to inform local emergency service providers and other interested parties of the duration and magnitude of the unplanned stoppages. The notification protocol will be in place prior to the beginning of operations involving transport of crude oil.
- To address potential vehicle safety impacts, each of the public at-grade crossings on the rail line, the applicant will work with PS&P to provide permanent signs that prominently display both a toll-free telephone number and a unique grade-crossing identification number in compliance with Federal Highway Administration regulations (23 Code of Federal Regulations 655). The toll-free number would enable drivers to report promptly any accidents, malfunctioning warning devices, stalled vehicles, or other dangerous conditions. The signs will be in place prior to the beginning of operations involving transport of crude oil.
- To address potential vehicle safety impacts, the applicant will coordinate with PS&P to make Operation Lifesaver educational programs available to communities, schools, and other organizations located along the rail line. Operation Lifesaver is a nationwide, nonprofit organization that provides public education programs to help prevent collisions, injuries, and fatalities at highway/rail grade crossings.

6.5.5.4 Unavoidable and Significant Adverse Environmental Impacts

The cumulative projects would have unavoidable and significant adverse impacts on vehicle delay in Aberdeen. The mitigation measures would reduce but not completely eliminate these impacts on vehicle traffic and safety. The vehicle delays would be most severe if a train were to pass by during the peak vehicle traffic hour. However, unavoidable and significant adverse impacts would also result during train transits at grade crossings in the Olympic Gateway Plaza area and between Poynor Yard and the project sites.

Addressing vehicle delay at the grade crossings at the Olympic Gateway Plaza area and between Poynor Yard and the project site would require the participation of a broad group of stakeholders in coordination with ongoing regional transportation planning efforts. Measures to reduce vehicle delay could include modifying PS&P operations to limit switching activities during peak traffic hours, adding new PS&P rail line infrastructure to reduce grade-crossing blockage time, or adding new queue-storage capacity at grade crossings that exceed available storage length. Ongoing regional solutions such as the East Aberdeen Mobility Project could reduce vehicle delay impacts and improve safety conditions at the Olympic Gateway Plaza area. In addition, further regional efforts to evaluate the potential improvements to reduce vehicle delay (such as grade separation, early warning system, grade-crossing protections), would also help to reduce vehicle delay.

6.5.6 Vessel Traffic

This section discusses potential cumulative impacts on vessel traffic that would result from construction and operation of the cumulative projects.

6.5.6.1 Study Area

The cumulative impacts study area for vessel traffic consists of the Terminal 1 berth and the entirety of Grays Harbor, including the navigation channel into and out of the harbor and travel corridors in state waters out to 3 nautical miles.

As described in Chapter 5, *Extended Rail and Vessel Transport,* the cumulative projects would not have a substantial impact on vessel traffic in the extended study area off the Washington coast. The impact of cumulative vessel traffic on environmental health from increased risk of incidents during vessel transport (e.g., vessel grounding or collision), and related consequences (e.g., oil spills from vessel tank ruptures) is described in Section 6.5.7, *Environmental Health and Safety*.

6.5.6.2 Cumulative Impacts

The following section describes the vessel traffic in Grays Harbor that could result from the construction and routine operation of the cumulative projects.

Construction

As noted in Chapter 3, Section 3.17, *Vessel Traffic*, construction of the proposed action is not anticipated to affect vessel operations because construction would be entirely contained on land and no in water. This is also true of the cumulative projects. Therefore, the cumulative projects would not result in any cumulative impacts on vessel traffic.

Navigation Channel Capacity

Baseline cargo and tank vessel trips in Grays Harbor are projected to increase from 324 to 422 between 2017 and 2037 due to increased trade of commodities. The cumulative projects would add an additional 758 tank vessel trips carrying crude oil per year to baseline traffic, resulting in a forecast of 1,082 total cumulative trips in 2017 and 1,180 total cumulative trips in 2037 (Table 6-18) for all vessel types.[31]

Table 6-18. Vessel Trips per Year—Cumulative Projects

	2017			2037		
Vessel Trips[a]	**Daily**	**Weekly**	**Annual**	**Daily**	**Weekly**	**Annual**
Baseline Conditions						
Cargo vessel	0.6	4.2	220	0.8	5.3	276
Cargo barge	0.2	1.4	72	0.3	1.8	92
Tank vessel[b]	0.1	0.6	32	0.1	1.0	54
Total Large Commercial Vessels	0.9	6.2	324	1.2	8.1	422
Cumulative Projects						
Westway Project			238	0.7	4.6	238
Imperium Project	1.1	7.7	400	1.1	7.7	400
Grays Harbor Rail Terminal Project	0.3	2.3	120	0.3	2.3	120
Cumulative Vessel Trips	2.1	14.6	758	2.1	14.6	758
Total Vessel Trips	**3.0**	**20.8**	**1,082**	**3.2**	**22.7**	**1,180**

[a] Vessel trips represent one-way trips.
[b] Numbers do not reflect Imperium no-action vessels, because proposed action number is total for facility.

The capacity analysis considered the number of navigable 2-hour windows available for vessels with different drafts and tidal elevations at the 2017 project depth of 38 feet mean lower low water (Table 6-1).

Cargo barges transiting to the mouth of the Chehalis River or further inland are forecast to account for 72 trips per year (approximately 7% of total commercial vessel trips) at the Port in 2017 and 92 trips per year (8% of large commercial vessel trips) in 2037. These vessels are not considered deep-draft. They have drafts between 0 and 17 feet, consistent with vessel data reported between 2008 and 2012 (Chapter 3, Section 3.17, *Vessel Traffic*).

The remaining trips under cumulative conditions would consist of tank and cargo vessels. It is anticipated that approximately half of the remaining vessel trips (either inbound or outbound trips) would be made by vessels in ballast. Vessels transiting in ballast would have a shallower draft (less than 27 feet) than when they are laden with cargo (U.S. Army Corps of Engineers 2014).

Based on these assumptions, approximately 53% of the total vessel trips (cumulative projects plus baseline) (577 in 2017 and 636 in 2037) would be made by vessels not considered to be deep draft, or vessels that draft less than 27 feet.[32] At the 2017 project depth of 38 feet mean lower low water,

[31] As noted in Section 3.16, *Vessel Traffic*, projected traffic increases unrelated to the proposed action were based on growth rates used in the Grays Harbor Channel Deepening Project.
[32] This percentage is slightly greater than 50% because cargo vessels have a shallower draft even when in ballast.

these vessels would be unconstrained by tidal elevations. The remaining 47% of all vessel trips (505 in 2017 and 544 in 2037) would be made by vessels with drafts between 27 and 39 feet.

Tank barges are most likely to call at Terminal 1 to load bulk liquids for the Westway and Imperium projects. The quantitative analysis in Chapter 3, Section 3.17, *Vessel Traffic*, assumes that the Crowley 550-Class articulated tug-barge or similar tank barges would be used. By assuming all tank barges, the analysis considers the highest possible number of vessel trips. If larger-capacity tankers are used, the number of vessel trips would be reduced. For the Grays Harbor Rail Terminal project, tankers are likely to call at Terminal 3 to load bulk liquids.

At the 2017 project depth of 38 feet mean lower low water, deep-draft vessels with drafts of 37 feet or less would have 1,627 navigable windows available each year, those with drafts of 38 feet would have 1,274 navigable windows and those with drafts of 39 feet or greater would have 904 navigable windows. Because the number of navigable windows available for transit of deep-draft vessels exceeds the total number of forecast laden vessel trips in 2017 or 2037 (505 in 2017 and 544 in 2037), the channel capacity would not be exceeded with the cumulative projects.

As described in Chapter 3, Section 3.17, *Vessel Traffic*, actual channel depths may vary considerably from project depths between maintenance dredging because sand and silt will accumulate in the channel. If the controlling depth of the navigation channel is reduced, the number of navigable windows at each tidal elevation threshold would be the same, but the maximum vessel draft possible at each tidal elevation would be reduced. Similar to current conditions, vessels with the greatest draft restriction would be given priority for transiting at the highest tidal elevations. Vessel operators may reduce the amount of cargo that is loaded to reduce the draft of the laden vessel and increase the transit opportunities. Given the flexibility of transiting at higher tidal elevations and/or reducing the cargo and draft of laden vessels, it is anticipated that vessel operators would be able to find navigable windows for the forecasted cumulative deep-draft vessel trips, even if the project depth of 38 feet mean lower low water is not maintained between dredging.

Berth Capacity at Terminal 1

As described in Chapter 3, Section 3.17, *Vessel Traffic*, assuming berth availability of 90%, the Terminal 1 berth would be available to receive vessels 328 days per year. Vessels are estimated to occupy the berth from 24 hours (tank barges) to 48 hours (tankers). The analysis assumed 100% tank barges for the cumulative projects, which results in a conservative estimate of the most days of berth occupancy. Vessel calls associated with the Grays Harbor Rail Terminal project would call at Terminal 3 and would not affect the capacity of the Terminal 1 berth.

The cumulative tank barge calls would be 319 (119 for the Westway project and 200 for the Imperium project) and each would occupy the berth for 24 hours each, resulting in 319 days of berth occupancy. The baseline forecast[33] consists of 17 tankers, which would occupy the berth 34 days and 10 tank barges would occupy the berth for 10 days, for a total baseline forecast of 44 days without the cumulative projects. The total berth occupancy—baseline plus cumulative—would be 363 days per year. This would exceed berth availability by 35 days.

[33] Includes existing and projected vessels for the Westway project only. No Imperium vessels are counted, because the Imperium project represents the total for the Imperium facility.

If tankers replaced tank barges under the cumulative projects, berth occupancy could be as low as 318 days per year and there would be sufficient capacity.

Other Capacity Constraints—Pilots and Escorts

State-Licensed Pilots

Grays Harbor is subject to compulsory Washington State pilotage for foreign vessels and U.S. vessels under enrollment and registered in foreign trade. All large commercial vessels engaged in foreign commerce would require Washington State pilots with Grays Harbor experience and knowledge (a requirement of their license and training). Domestic vessels on a coastwise voyage may enter and depart Grays Harbor under the control of a U.S. Coast Guard (federally) licensed captain.[34] However, many U.S. vessels calling at Washington State ports seek the assistance of a state-licensed pilot on a voluntary basis, or as a matter of company policy, even though it is not required by regulation.

The cumulative number of trips by large commercial vessels (cargo and tank vessels) is forecast to reach 1,082 trips in 2017 and 1,180 trips in 2037. The Port currently employs three state-licensed pilots, with two pilots to be on duty at any given time. If all cargo and tank vessels hired a state-licensed pilot to navigate to and from the Port, this would result in a maximum of 1,180 annual assignments, or approximately 393 annual assignments for each of the three state-licensed pilots currently employed by the Port.

Trips taken by state-licensed pilots in Grays Harbor are comparatively short (on average, 2 hours outbound or 2 hours inbound) and are limited to the navigation channel.[35] This would make it feasible for a pilot to take one vessel outbound and bring another inbound during a single high tide window if the volume of vessel traffic warranted this approach. Moreover, because Grays Harbor has a semidiurnal tidal cycle (with two high tides per day), there is more than one navigable window each day to pilot a vessel to or from the Port.

If needed to handle forecast growth, additional pilots could be trained. It takes approximately 9 months for a new pilot to obtain his/her first state license to handle smaller vessels and approximately 2.5 years to become fully qualified.

In accordance with WAC 363-116-065, Number of Pilots, the Puget Sound Board of Pilotage Commissioners regularly considers the number of pilots needed to optimize the operation of a safe, fully regulated, efficient, and competent pilotage service in the Grays Harbor pilotage district. The Port will continue to work with the Puget Sound Board of Pilotage Commissioners to forecast the number of vessels that would require a state-licensed pilot well in advance of anticipated increases, to allow for training and onboarding of additional pilots. If necessary, the Puget Sound Board of Pilotage Commissioners could support the Port by temporarily reassigning a qualified state-licensed pilot from Puget Sound to Grays Harbor (Larson pers. comm.).

[34] Table 15.812(e)(2) in Title 46 Code of Federal Regulations requires (among other things) that the Master or Mate of a U.S. Inspected Tank Barge of 10,000 gross tons or less have 12 trips over the route to control the vessel in designated pilotage waters.

[35] In comparison, the Puget Sound pilots may spend up to 6 to 8 hours on one vessel and must debark in a completely different geographic area than where they started, adding travel time home to the assignment.

Escort Tugs

Brusco Tug & Barge has three harbor tugs stationed in Grays Harbor exclusively available for commercial vessel assistance in the harbor. During normal operations, two tugs (one at the bow and one at the stern) assist large commercial vessels (cargo and tank vessels) with docking and undocking at the Port berths. A third tug may be used when conditions warrant, such as during high winds (D'Angelo pers. comm.).

Cumulative one-way inbound or outbound trips by large commercial vessels are forecast to reach 1,082 in 2017 and 1,180 in 2037, or approximately 3.0 vessel trips a day in 2017 and 3.2 vessel trips a day in 2037. Both inbound and outbound vessels would use tug assists during docking (inbound vessels) or undocking (outbound vessels). Escort tugs can be readily moved between the Port terminals to assist with docking and undocking and, if needed, one or more tugs could be added to the fleet. It is not anticipated that availability of tugs would limit vessel operations at the Port for the cumulative vessel traffic.

Escort tugs are not currently required for tank vessels in Grays Harbor. Oil tankers carrying product to or from the Imperium project site do use escort tugs as part of their Washington State approved facility operations plan. The Harbor Safety Plan for Grays Harbor has a *standard of care* (similar to a best management practice) that recommends tug escorts for all laden tank vessels carrying oil. The standards recommend:

- At least one escort tug should meet an arriving laden tank vessel carrying oil at the Grays Harbor entrance and escort it to the Hoquiam River where two tugs (escort and assist) assist the vessel during mooring procedures.
- At least one escort tug will accompany a departing laden tank vessel carrying oil from the terminal to the entrance of Grays Harbor.

Cumulative tank vessel calls would reach 395 in 2017 and 406 in 2037. A single vessel call includes an inbound and an outbound vessel transit, and it is assumed that the vessel is laden (and therefore, requires an escort) in only one direction. Under this scenario, approximately 1.1 tank vessel calls per day, on average, would require an escort tug, which would not exceed the capacity of tugs to escort laden tank vessels. Escort tugs reduce the potential for a vessel incident such as loss of steering or propulsion that could affect vessel traffic and pose a safety risk.

Commercial (Nontreaty) Fishing

As noted in Chapter 3, Section 3.17, *Vessel Traffic*, the proposed action could result in increased disruption to commercial fishing in the navigation channel when a vessel is traveling to and from the project site or is docked at Terminal 1. This potential for disruption would increase with the cumulative projects, with vessel traffic in the navigation channel increasing from 1.1 trips per day to 3.2 trips per day and vessel occupancy at Terminal 1 increasing up to 363 days per year. During periods of maximum catch for Chinook, coho, or chum salmon, the fall fishery may be open 2 to 4 days per week. Approximately 15 to 25 boats participate each year up to 5 days per week during the open season (Scharpf pers. comm.).

As noted in Section 3.17, *Vessel Traffic*, assuming the vessel is traveling between the Crossover Channel Reach of the navigation channel and Terminal 1 for approximately half of the 2-hour transit time, including docking and undocking maneuvers, an individual vessel trip could disrupt fishing for a 1-hour period. When a vessel is traveling through the area, commercial fishers can either avoid the

area entirely (fish elsewhere) or cut their drifts short (pull the nets in sooner) to avoid conflicts with vessels. Fishers would need to monitor radio communications for inbound and outbound vessel traffic and be prepared to retrieve fishing gear when a vessel is transiting the area.

On average, vessels related to the cumulative projects would also be at the dock more frequently, approximately 7 days per week compared to an average of 1 day per week under the no-action alternative. Depending on the specific circumstances of each interaction (e.g., chance of a vessel calling during an open fishing window, distribution of the fish, number of fishers on any given day), it is difficult to predict whether increased occupancy at Terminal 1 would substantially affect any single fisher's ability to reach their limit. If a vessel is at berth during the fall fishery, fishers would have the option to fish longer (complete more drifts) or may choose to fish other preferred locations in Grays Harbor (such as other portions of the navigation channel, farther away from the shoreline or father upstream), although opportunities to relocate during intense fishing periods may limited if the other areas are occupied by fishers.

As noted in Chapter 3, Section 3.17.4.3, *Fishing and Recreational Vessels,* ocean-fishing vessels may use the navigation channel to transport their catch to the harbor. To lessen the danger of hazardous conditions during incoming or outgoing tides, bar crossings are often timed during slack high or low tides, whereas large commercial vessels tend to navigate through the channel when tidal elevations are more than 5 feet. As noted previously, commercial fishers can navigate around larger vessels limited to the navigation channel to avoid potential impacts.

6.5.6.3 Mitigation Measures

Although the cumulative projects would increase large commercial vessel traffic in Grays Harbor, neither the navigation channel nor Terminal 1 berth capacity would be exceeded. However, increased vessel traffic would increase the potential for safety risks and conflicts with commercial fishers. Implementation of the applicant mitigation measures, described in Section 3.17, *Vessel Traffic*, and repeated below, would reduce cumulative impacts.

- Due to sensitivity of the local environment, tribal resources, and the potential presence of special-status species, to reduce potential risk of incident due to loss of propulsion, loss of steering, grounding, or severe weather, the applicant will not receive or load crude oil to tankers or tank barges unless the vessels have escort tugs through Grays Harbor as described below. This requirement will remain in place until rules are implemented pursuant to ESHB 1449, Section 12, at which time the rules will apply to the project. At least one escort tug must accompany a laden tanker or tank barge carrying oil between the Hoquiam River and Grays Harbor entrance, and two tugs (one escort tug and one assist tug) must assist the vessel during mooring procedures.
    - For laden tankers, the escort tug must be appropriately tethered while transiting Grays Harbor.
    - Escort tugs must have an aggregate shaft horsepower equivalent to at least 5% of the deadweight tons of the escorted oil tanker or tank barge.
    - Escort tugs must have sufficient mechanical capabilities to provide for safe escort.
- To ensure adequate safety for tug operations and thereby reduce the risk of an incident, the applicant will not receive or load crude oil to tankers or tank barges unless the vessels supply

Grays Harbor pilots and tug companies with bollard pull capacities of the vessels prior to entering Grays Harbor.

- To reduce potential risk of incident of vessel collision or allision in Grays Harbor, the applicant will work with U.S. Coast Guard, Ecology, Port, and Grays Harbor Safety Committee to propose, develop, and implement a formal vessel management system. The vessel management system will include the ability to schedule, track, and monitor vessel movements in the harbor and off the entrance to the harbor. The vessel management system will be active prior to the applicant beginning the proposed operations.
- To reduce potential risk of incident of vessel collision while in Grays Harbor, the vessel management system will take the following actions.
  - Ensure vessel traffic is limited while a laden tank vessel is in the navigation channel.
  - Prohibit the transit of any other deep-draft vessels within the south channel (just off Westport) to Terminal 1 in both directions whenever a laden tank vessel is transiting within the same channel.
  - Include real-time automatic identification system tracking and monitoring.
- To reduce the risk of an incident, the applicant will coordinate with the Port and, as a member of the Grays Harbor Safety Committee, work to develop and implement specific procedures for escorting, tethering, and emergency maneuvering to control laden tank vessels. The procedures must be drafted prior to the proposed operations beginning. These procedures should be included in the Grays Harbor Safety Plan. At a minimum, these must include the following elements.
  - Escort configurations and maneuvering characteristics of escorted tankers and tank barges.
  - Specific emergency connection and tethering procedures for connection of escort tugs to tankers and tank barges.
  - Specific maneuvers necessary for the escort tugs to maintain control of the tanker while transiting Grays Harbor waters specifically during incidents of loss of propulsion or steering or in bad weather.
  - Appropriate safe speed of transit in Grays Harbor when escort tugs are tethered.
  - Guidelines for tanker or tank barge bridge team to rapidly recognize and respond to a loss of power or steering. By improving recognition and reaction time, the escort tugs can more effectively steer the vessel through the navigation channel upon incident.
  - Requirement for a pretransit conference.
  - Requirements for refueling of the vessel.
- While commercial fishing boats are required to follow the U.S. Coast Guard navigation rules, to improve awareness of vessel traffic in the navigation channel, the applicant will work with the Grays Harbor Safety Committee, including the U.S. Coast Guard and Port of Grays Harbor, to establish procedures to announce project related vessel traffic arrivals and departures over a designated VHF marine radio channel.

6.5.6.4 Unavoidable and Significant Adverse Environmental Impacts

Under existing fishing conditions, increased vessel traffic would cause a disruption when commercial fishers are in the navigation channel. This conflict is most likely to occur related to harvest of salmon, steelhead, and sturgeon during the fall fishery. Although vessel operations related to the cumulative projects are reasonably certain, it is not possible to determine how the proposed action could affect a commercial fisher's daily catch because of other unpredictable factors (number of fishers, fish distribution, timing, and duration of fishing window on any given day of any given week). However, it is anticipated that because there are alternate fishing areas and because there would be additional days/windows to fish uninterrupted, impacts would not be significant.

6.5.7 Environmental Health and Safety

This section discusses potential cumulative impacts on environmental health and safety that would result from construction and operation of the cumulative projects.

6.5.7.1 Study Area

The cumulative impacts study area for environmental health and safety includes Grays Harbor, the 59 miles of PS&P rail line to the junction with the BNSF main line in Centralia, and the cumulative project sites. Within this area, the operations of interest include the storage and transfer (loading and unloading) of products for the cumulative projects and the associated rail and vessel movements, particularly for crude oil and bulk liquids.

6.5.7.2 Cumulative Impacts

This section describes the cumulative increases in risk that could result from the cumulative projects.

Risk management involves the systematic identification, evaluation, and control of impacts that may arise from uncertain future events such as oil spills, fires, explosions, toxic releases, or natural disasters. Assessing a risk to a particular resource requires identifying possible hazards, evaluating the frequency of adverse events and the magnitude of their consequences, and determining appropriate measures for prevention or mitigation. By anticipating the level of risk and the potential impacts, preventive and mitigation measures can be implemented to reduce the frequency of an event, the impacts, or both.

Because it is not possible to predict the timing or magnitude of an oil spill, this analysis focuses on spill scenarios. Scenarios were developed for a range of potential incidents involving the terminal, trains and vessels. These scenarios considered spills and fires/explosions involving existing conditions (no-action alternative), typical daily operations of the cumulative projects or during offsite rail and vessel transport, and worst-case spills. Risk assessments were done using these scenarios to identify the likelihood a spill could happen. Scenarios included the following conditions.

- Incidents involving onsite handling and storage of crude oil and bulk materials at the cumulative project sites.
- Incidents involving trains transporting crude oil and bulk materials along the PS&P rail line.
- Incidents involving vessels transporting crude oil and bulk materials in Grays Harbor.

The scenarios considered various sizes of potential spills based on the activity (such as transport or transferring oil) and size of tank, rail cars, and vessels. To simplify descriptions, spill scenarios are identified using the amount of material spilled.

Table 6-19. Oil Spill Scenarios by Size

Size	Typical Scenario
Small	· 2,100 gallons (50 barrels) spilled when transferring oil from rail cars or to vessels at the project site · 1,000 gallons (24 barrels) spilled during a derailment along the PS&P rail line
Medium	· 50,400 gallons (1,200 barrels) spilled from pipeline or storage tank on site · 10,000 gallons (238 barrels) spilled when transferring oil from the facility to a vessel at the project site · 30,000 gallons (714 barrels or the contents of one full tank car) spilled during a derailment along the PS&P rail line
Large	· 3.36 million gallons (80,000 barrels or the contents of one full storage tank) spilled on site · 90,000 gallons (2,140 barrels or the contents of three full tank cars) spilled during a derailment along the PS&P rail line · 150,000 gallons (3,570 barrels or the contents of five full tank cars) spilled during a derailment along the PS&P rail line · 900,000 gallons (21,400 barrels or the contents of 30 full tank cars) spilled during a derailment along the PS&P rail line · 105,000 gallons (2,500 barrels) spilled into Grays Harbor from a vessel collision · 15.1 million gallons (360,000 barrels or the entire contents of a full tanker, including fuel) spilled into Grays Harbor during a vessel allision at harbor entrance

Using this information, the analysis first determined the likelihood that a spill would occur using the following methods. In general, the larger the spill, the less likely that the spill would occur.

- For spills at the terminals, operational information, such as the number of rail car unloadings, vessel loadings, and storage tanks in use, was combined with historical information on spills associated with these activities to determine the likelihood of spills.
- For spills along the PS&P rail line, the number of rail trips carrying crude oil was combined with historical information from the Federal Rail Administration on incidents on the PS&P rail line and across the country to determine the likelihood of spills.
- For spills during vessel transport, the number of vessel trips carrying crude oil was combined with historical information on vessel accidents to determine the likelihood of spills.

The risk assessment considered the type of operations, transportation routes for trains and vessels, and historic incident data to determine the likelihood of an incident happening. The analysis looked at a 20-year period from 2017 to 2037 for the proposed action.

The analysis first quantified the *chance* of each spill scenario occurring in any given year in the 20-year analysis period. It then qualitatively assessed the *likelihood* based on the likelihood of an incident occurring. The quantitative analysis is included in Appendix M, *Risk Assessment Technical Report*.

The *likelihood of an incident* is defined as follows.

- **Likely to happen.** Involves regular transportation and facility operations or conditions that would be expected *to frequently happen*.
- **Unlikely to happen.** Involves unusual operations or conditions that would be expected *to rarely happen*.

Oil Spills

Onsite Risks

The cumulative projects would result in the potential for more frequent spills of bulk liquids relative to the no-action alternative and to the proposed action alone, although the orders of magnitude are very similar. The likelihood of very large releases from storage tank failures would remain low. The relative risks are shown graphically in Figure 6-7 and summarized below.

Figure 6-7. Cumulative Environmental Health Risks from Potential Spills at the Terminal (Onsite)

- During rail unloading operations, a release of up to 4.8 barrels (200 gallons) could occur once every 3 years. This amount is less than the unloading area containment that would be at least 30,000 gallons so the spill is expected to be contained on the facility.
- During vessel transfer operations, a release of 238 barrels (10,000 gallons) could occur every 43 years. A small amount of the oil would be contained on the facility or vessel but the remaining oil could spill to water. This amount is less than the containment area so the spill is expected to be contained on the facility.

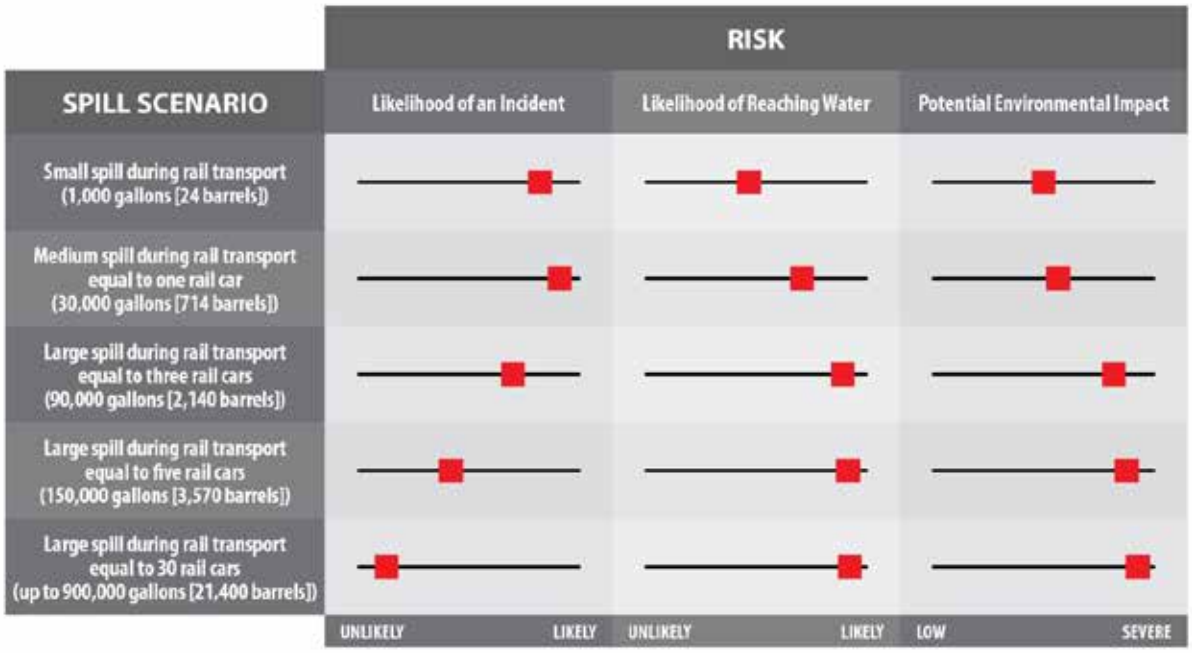
- An extreme failure of a storage tank could occur every 9,000 years. This could be caused by a construction or material failure, containment failure, or seismic or tsunami event. Some of the oil would be caught in the containment area, but the remaining oil could spill to land or water. Releases of 1,200 barrels (50,400 gallons) from the tanks or piping in the containment areas could occur every 455 years. This amount is less than the containment area so the spill is expected to be contained on the facility.

Each proposed facility would operate independently, so cumulative impacts from facility operations alone are not likely. The amount of oil and bulk liquids stored and moved by the facilities is higher cumulatively and could result in increased potential for spills from the facilities. Spills could be from operations, during transfers, from catastrophic failure of tanks, or from piping.

Rail Risks

Because of the increased number of rail trips related to the cumulative projects, there would be a greater potential for more frequent spills of bulk liquids relative to the no-action alternative or to the proposed action alone, although the orders of magnitude are very similar. The likelihood of very large releases would remain low. The relative risks are shown graphically in Figure 6-8 and the likelihoods are summarized below.

Figure 6-8. Cumulative Environmental Health Risks from Potential Spills during Rail Transport



- The chance of a minor collision or derailment resulting in a minor spill from one rail car is predicted to be once in 29 years, with a slight reduction to once in 31 years for 2037.
- The chance of a collision or derailment resulting in a loss equivalent to one rail car is predicted to be once in 11 years, dropping to once in 13 years for 2037.

- The chance of a collision or derailment resulting in the loss equivalent to three rail cars is predicted to be lower, at once in 73 years for 2017 and once in 110 years for 2037.
- The chance of a collision or derailment resulting in a loss equivalent to the content of five rail cars is predicted to be lower, at once in 1,400 years for 2017 and once in 3,300 years for 2037.
- The chance of an extreme event involving a release from a large number of rail cars is predicted to be once in 22,000 years for 2017 and once in 44,000 years for 2037.

The cumulative impact of 7.5 trains per day could result in an increased potential for derailments or incidental releases of oil and hazardous substances, pollutants, and contaminants during transport or incidents. The risk of an oil spill from train operations typically relates to the risk of derailment. However, a derailment does not mean a spill will happen; a train can derail with no spill resulting. A leak could occur during transit of the rail car but the spill quantity at a single point along the rail would be expected to be small.

The cumulative projects considered in the cumulative impacts analysis involve rail transport of oil. Operation of the cumulative projects would result in increased rail traffic along the PS&P rail line. The Pipeline and Hazardous Materials Safety Administration analysis concludes that the projected continued growth of domestic crude oil production and the growing number of train incidents involving crude oil have increased substantially the potential for future severe train incidents involving crude oil in high-hazard flammable trains. This increase in rail traffic would generally increase the risk of more frequent releases of bulk liquids, although the risk of very large releases remains relatively low.

Vessel Risks

Because of the increased number of vessel trips related to the cumulative projects, there would be a greater potential for more frequent spills of bulk liquids relative to the no-action alternative and the proposed action alone, although the orders of magnitude are very similar. The likelihood of very large releases would remain low. The relative risks are shown graphically in Figure 6-9 and the likelihoods are summarized below.

Figure 6-9. Cumulative Environmental Health Risks from Potential Spills during Vessel Transport

- A collision with another vessel during transport causing a spill of 2,500 barrels (105,000 gallons) could occur every 45 years.
- An extreme spill from a vessel (loss of the entire contents[36]) due to an allision with a fixed object (e.g., the entrance jetty) could occur every 116 years.
- An extreme grounding resulting in the loss of the entire contents[37] of vessel could occur every 128 years.

Fires or Explosions

This section describes the likelihood of fires or explosions for the different release scenarios identified previously.

Onsite Risks

A spill could cause a fire or explosion if there is an ignition source and combustible gases are present in a quantity that could ignite. The incident could cause sparking, which could ignite the spill. Many of the materials to be handled under the cumulative projects are flammable but they are generally in a liquid and not gaseous form. Typically, terminal activities resulting in a spill would have limited potential to result in ignition because terminals are designed to reduce ignition potential. Liquid materials would pool on the ground with only limited vapor generation—particularly compared to other common materials like propane. The risks of fires or explosions at the terminal are presented graphically below in Figure 6-10. Additional information regarding the risks of fire and explosions during rail transport is provided in Chapter 4, *Environmental Health and Safety*, and Appendix M, *Risk Assessment Technical Report*.

[36] These risks assume use of tank barges, which could carry up to 185,000 barrels. As noted previously, larger Panamex-class vessels carrying up to 360,000 barrels could be used. Use of larger vessels would reduce the number of trips needed and, would generally result in a lower likelihood of a similar accident (i.e., collision or allision) occurring.

[37] These risks assume the use of tank barges, which could carry up to 185,000 barrels. As noted previously, larger Panamax-class vessels carrying up to 360,000 barrels could be used. Although the decrease in number of trips associated with using larger vessels would generally result in a lower chance of an accident, this reduction would be offset, in part, by the increased potential for grounding associated with a deeper-draft vessel. Therefore, the risks of a 185,000-barrel spill versus a 360,000-barrel spill are likely to be similar.

Figure 6-10. Cumulative Environmental Health Risks from Potential Fires/Explosions at the Terminal (Onsite)

Rail Risks

Explosions are most likely when a spill is ignited and the resulting fire impinges on another tank or rail car. As the material in these adjacent tanks or rail cars heat up, the pressure builds and may eventually burst the container. The extent of the damage depends on the exact configuration of the release and fire compared to the location of the other tanks or rail cars, any fire suppression capabilities, and the timing and nature of response actions. It also depends on the material: Bakken crude oil is more flammable than other heavier crude oils. The flammability of diluted bitumen varies based on the diluent (diluting agent) used. Other proposed bulk liquids, such as jet fuel, gasoline, kerosene, and naphtha are also highly flammable.

Although fires or explosions can result from spills resulting from events like collisions and derailments, long-term historical data show that most spills do not result in fires or explosions. A fire or explosion would be less likely to occur than a spill. While there have been multiple recent derailments of trains on main lines that resulted in fires or explosions, the chance of an extreme derailment is very limited in the study area because of the slow speeds on the PS&P rail line, which are slower than typical mainline speeds. In general, large derailments from high-speed trains lead to releases from multiple rail cars. The energy involved in high-speed derailments and the resulting scatter of rail cars yield the greatest chance of a fire or explosion that affects other rail cars.

The cumulative risks of fires or explosions during rail transport are presented graphically in Figure 6-11. Additional information regarding the risks of fire and explosions during rail transport is provided in in Chapter 4, *Environmental Health and Safety,* and Appendix M, *Risk Assessment Technical Report*.

Figure 6-11. Cumulative Environmental Health Risks from Potential Fires/Explosions from Rail Transport

Vessel Risks

The risks of fires or explosions during vessel transport related to cumulative projects are presented graphically in Figure 6-12. Additional information regarding the risks of fire and explosions during rail transport is provided in Chapter 4, *Environmental Health and Safety*, and Appendix M, *Risk Assessment Technical Report*.

Figure 6-12. Cumulative Environmental Health Risks from Potential Fires/Explosions during Vessel Transport

Impacts on Resources

With the cumulative projects, although the chance of an incident occurring would be cumulatively greater, the potential consequences of any one event would be similar to those described in Chapter 4, *Environmental Health and Safety.* While the increased activities from the concurrent operation of all cumulative projects would increase the risk of a release, the expected impacts from any of the release scenarios would remain the same. As discussed in Chapter 4, Section 4.7, *Impacts on Resources*, exposure to the proposed bulk liquids could result in adverse impacts on the following resources.

- **Water, plants, and animals.** In general, the proposed bulk liquids can degrade water quality and result in toxic exposure of plants and animals to harmful chemicals. Depending on the specific circumstances, exposure can cause tissue damage in plants and animals that can affect respiration, reproduction, and behavior. In extreme cases, exposure can result in death.
- **Tribal resources.** Harm to natural resources used by tribes for commercial, subsistence, or ceremonial purposes could result in adverse impacts on tribal resources.
- **Aesthetics, recreation, and cultural resources.** Crude oil can cause aesthetic impacts by coating the environment and resulting in large areas of reduced vegetative growth. These impacts can disrupt recreational activities if areas affected by spills have to be closed to prevent harm of exposure to people or to conduct cleanup activities. Spilled oil can also cause damage to historic structures or other important cultural resources. Depending on the circumstances of the incident and the nature of the cleanup activities, ground disturbance during cleanup may also adversely affect archaeological resources.
- **Human health.** Exposure to the bulk liquids can adversely affect humans, primarily through exposure to harmful air pollutants in the first few minutes of a spill. Depending on the circumstances of the incident, if people inhale crude oil vapors, they may suffer irritation to their respiratory systems, which can cause dizziness, rapid heat rate, headaches, confusion, nausea, and / or vomiting.

If a spill results in a fire or explosion, additional damage could occur, including those listed in Chapter 4, Section 4.7, *Impacts on Resources*, that have occurred related to recent rail incidents. The air pollutants of health concern are carbon monoxide, lead, nitrogen dioxide, particulate matter, sulfur dioxide, and polycyclic aromatic hydrocarbons. Inhalation of these byproducts can cause irritation of the respirator system. This may harm the nose, passages and lungs by causing difficulty in breathing, coughing, and itching. Similar types of air pollutants would be found from the burning of refined crude oil distillates (gasoline, naptha, heating fuel, jet fuel, diesel).

Fires or explosions can also harm plants and animals. Depending on the extent of the damage, changes affecting community structure and function of ecosystems could occur. For example, if exposed to high, sustained temperatures, specific plant and animal communities could become more susceptible to other harm, such as increased risk of disease or predation. If individual species are adversely affected at a broader population level, the overall structure and function of the community could be altered. Harm to natural resources used by tribes for commercial, subsistence, or ceremonial purposes could also result in adverse impacts on tribal resources.

Similar to potential impacts associated with spills, damage caused by fires or explosions could adversely affect aesthetic resources, important historic structures, or recreational resources. This damage could be made worse due to cleanup activities.

6.5.7.3 Mitigation Measures

Operation of the cumulative projects would increase the risk of environmental damage along the PS&P rail line, at the project site, and in Grays Harbor. Implementation of the applicant mitigation measures identified in Chapter 4, *Environmental Health and Safety*, and repeated below, would reduce cumulative impacts.

- To improve response times and communication in the event of an incident that could affect tribal resources, the applicant will include tribal contacts (names and/or phone numbers) in notification protocols in the oil spill contingency plan.
- To reduce the impacts from an oil spill, the applicant will establish and implement a procedure for blocking all drains on the dock prior to oil transfers and observing the area for discharges before removal.
- To improve oil recovery in the case of a spill during vessel loading at the dock, the applicant will retain a licensed engineer to perform an independent engineering analysis and feasibility study to determine the number of days it is safe and effective to pre-boom oil transfers and to identify site-specific improvements to maximize successful prebooming. The applicant will ensure the study is submitted to Ecology for review. If approved, Ecology will amend the applicant's oil spill contingency to require prebooming and improvements consistent with the study.

  If improvements to allow for pre-booming are determined to be unfeasible by Ecology and until changes are in place, the applicant will implement alternative measures, including but not limited to the following (in addition to those already required by regulation) to mitigate the absence of preventative boom in the water during transfers: stage dedicated response vessels, additional containment and clean-up equipment, and trained personnel at the terminal dock and/or at a nearby staging area during oil transfers. At a minimum, this alternative must include the following elements.

  - One oil spill response vessel with crew, skimmer, and at least 1,000 feet of boom at the dock.
  - On-water tank barge storage devices (not including bladders) prestaged at the dock with the skimmer to ensure a minimum of 450 barrels of recovery ready to be deployed.
- To reduce the risk of a spill, the applicant will require the facility person-in-charge (certified facility operator for oil transfers) to verify all connections are properly functioning for each oil transfer prior to the commencement of a transfer.
- To prepare for spills, the applicant will fully comply with Washington State contingency planning standards in place of any alternative measures previously approved in the oil spill contingency plan.
- To reduce the risks and impacts from an oil spill, prior to beginning the proposed operations the applicant will conduct a study to identify an appropriate level of financial responsibility for the potential costs for response and cleanup of oil spills, natural resource damages, and costs to state and affected counties and cities for their response actions. The study should follow Revised Code of Washington 88.40.025, Evidence of Financial Responsibility for Onshore or Offshore Facilities, and consider factors including a reasonable worst-case spill volume, the cost of cleaning up the spilled oil, the frequency of operations at the facility, and the damages that could result from the spill (including restoration). The study should identify any constraints related to the commercial availability and affordability of financial responsibility. Based on the study, Ecology shall determine the appropriate level of financial responsibility and require the

applicant to demonstrate their financial responsibility to the satisfaction of Ecology. Proof of financial responsibility will be included as documentation in the applicant's contingency plan.

- To improve preparedness for incidents, including oils spills, explosions, and fires, the applicant will ensure an emergency preparedness workshop is conducted prior to beginning project operations. The applicant will coordinate the workshop with Ecology. The workshop will be no more than 1 day in length and be held prior to beginning operations and annually thereafter. The initial workshop will focus on familiarizing local emergency responders, tribes, and communities with the contents of the Northwest Area Contingency Plan, the Grays Harbor and Chehalis Geographic Response Plans, other local response plans, the facility response plan, and the measures that are in place for a rapid and effective spill response.
- To improve the safe transport of crude oils with different volatilities and sinking tendencies, the applicant will not accept crude oil by rail unless the following actions have occurred.
  - The applicant has received verification that a sample of the oil has been tested and properly classified and characterized.
  - Where classification and characteristics of the oil are available in advance, the applicant has fully described this information and the implications for emergency response in its oil spill contingency plan.
- To reduce risks of a spill due to a rail incident, the applicant will not accept crude oil unit trains by rail unless the train has in place a functioning two-way end-of-train device or distributed power for operations on the PS&P rail line to the local yard.
- Due to sensitivity of the local environment, tribal resource concerns, and the potential presence of special-status species, to improve coordination and response capabilities in the event of a rail accident, the applicant will not accept crude oil by rail unless PS&P prepares, submits to Ecology for approval, and implements a contingency plan meeting the requirements identified below. This requirement will remain in place until state contingency plan requirements for railroads are implemented by Ecology pursuant to ESHB 1449, Section 5, and/or amendments to the federal oil spill response plan rule (49 Code of Federal Regulations 130) is adopted.
  - Disclose full details of the method of response to spills to various sizes.
  - Define a worst-case spill planning volume.
  - Identify response notification and coordination procedures.
  - Identify personnel assigned to implement the plan.
  - Reference applicable Washington State geographic response plans.
  - Describe a training and exercise program for personnel and equipment.
  - Identify prepositioned spill containment and cleanup equipment and trained personnel.
  - Identify arrangement for enlisting qualified and trained cleanup personnel to implement the plan.
  - Describe how plan relates to other relevant contingency plans, such as facility plans, other rail plans, including federal oil spill response plans, and regional plans.
- To improve first response effectiveness and safety, the applicant will consult with the Olympic Region Clean Air Agency and U.S. Environmental Protection Agency to identify air monitoring

equipment needs for public health and safety in the case of a spill or explosion. The applicant will ensure equipment identified that is necessary for determining air quality conditions but not available through local agencies or fire departments will be made available to local fire departments.

- To increase the timeliness of responses to spills and incidents involving trains and to maximize coordination of responses along the PS&P rail line, the applicant will not accept crude oil by rail unless the following measures are completed.
  - PS&P participates with the local fire districts in a public safety drill at least once every 2 years.
  - PS&P tests one geographic response plan strategy annually and invites Ecology to participate.
  - PS&P participates in testing the applicant's oil spill contingency plan with a rail scenario at least once every 3 years, including participating in at least one drill every 3 years. This drill will be designed with Ecology and scheduled on the regional drill calendar.
- To improve response capability for spills that may occur on the Chehalis River, the applicant will coordinate with Ecology to advertise and extend registration of Vessels of Opportunity to the Chehalis River and to tribal boat owners prior to beginning operations. Applicants for the Vessel of Opportunity Program should be directed to www.oilspills101.wa.gov for information and registration.
- To improve response capability for trains transporting product to the project site, the applicant will not accept crude oil until a foam truck has been provided to the Elma Fire Department to provide fire-fighting capability along the PS&P rail line. The foam truck must be available and operational prior to beginning operations. The applicant will consult with Ecology and the local fire department to determine the capacity of the foam truck.
- To improve response times to reduce the initial impacts of an oil spill, the applicant will ensure that two trailers containing the spill response equipment listed below are available prior to beginning crude oil operations for use by initial local and emergency responders along the PS&P rail line. This equipment will be offered to fire departments along the PS&P rail line and the Chehalis Indian Tribe. The trailer and equipment will be maintained by the applicant and inspected annually. The equipment will only be provided to fire departments and Chehalis Tribe if they agree to store the equipment in a secure location and ensure the equipment used by appropriately trained personnel. The applicant will work with Ecology and local emergency officials to appropriately update the Western Region Response List website (www.wrrl.us), any applicable spills response plans to address the emergency equipment caches and to document notification protocols, necessary training, use of Personal Protective Equipment, and equipment deployment procedures. Mobile trailers of will be large enough to hold the following.
  - 3,000 feet of river boom in four 500-foot sections and five 200-foot sections
  - 5,000 feet of sausage sorbent boom
  - 30 kits – anchoring systems (anchors, lines, floats)
  - 20 kits – shoreside anchoring systems
  - 1 towing bridle
  - 4 heaving lines

- 1 machete (or other vegetation cutting tool)
- 1 pair of bolt cutters
- 50 sandbags
- 1 roll plastic sheeting
- 4 each plywood sheets (4 feet by 8 feet)
- 500 feet 3/8-inch poly line
- PPE: coveralls or Tyvek ® disposable suits, gloves, outer (chemical-resistant and disposable) boots, safety glasses or chemical splash goggles, hard hats – sufficient for 5 people

- To reduce risks related to an oil spill, the applicant will not accept crude oil by rail until PS&P meets with local emergency management officials to identify training needs for local responders who will respond to an emergency on the PS&P rail line. This effort will include development and execution of a training program to these responders to increase level of awareness and understanding of the hazards associated with an oil train incident. The training will include identification of notification protocols, use of Personal Protective Equipment, and equipment deployment procedures. This training will be completed before the applicant begins receiving oil trains and will be offered at least annually.
- To improve response capability on the Confederated Tribes of the Chehalis Reservation lands in the case of an oil spill, the applicant will ensure that an annual 1-day hazard awareness oil spill training for identified Chehalis tribal members is provided, including conducting and inviting tribal members to participate in drills.
- To improve response capability in the Grays Harbor area in the case of an oil spill, the applicant will ensure an annual one-day hazard awareness oil spill training is provided for identified Quinault Indian Nation tribal members, including conducting and inviting tribal members to participate in drills.
- To increase the timeliness and maximize the coordination of responses to spills and incidents involving crude oil trains along the PS&P rail line, the applicant will ensure the Grays Harbor Local Emergency Planning Committee's emergency response plan is updated to address the applicant's operations. This information must be included prior to beginning operations.
- Due to sensitivity of the local environment, tribal resource concerns, and the potential presence of sensitive species, to reduce potential risk of incident due to loss of propulsion, loss of steering, grounding, or severe weather, the applicant will not receive or load crude oil to tankers or tank barges, unless the vessels have tug escorts through Grays Harbor as described below. This requirement will remain in place until rules are implemented pursuant to ESHB 1449, Section 12, at which time the rules will apply to the project.
  - At least one escort tug must accompany a laden tanker or tank barge carrying oil between the Hoquiam River and Grays Harbor entrance, and two tugs (one escort tug and one assist tug) must assist the vessel during mooring procedures.
  - For laden tankers, the escort tug must be appropriately tethered while transiting Grays Harbor.

  - Escort tugs must have an aggregate shaft horsepower equivalent to at least 5% of the deadweight tons of the escorted oil tanker or tank barge.
  - Escort tugs will have sufficient mechanical capabilities to provide for safe escort.
- To ensure adequate safety for tug operations and thereby reduce the risk of an incident, the applicant will not receive or load crude oil to tankers or tank barges unless the vessels supply Grays Harbor Pilots and tug companies with bollard pull capacities of the vessels prior to entering Grays Harbor.
- To reduce potential risk of incident of vessel collision or allision in Grays Harbor, the applicant will work with the U.S. Coast Guard, Ecology, the Port, and Grays Harbor Safety Committee to propose, develop, and implement a formal vessel management system. The vessel management system will include the ability to schedule, track, and monitor vessel movements in the harbor and off the entrance to the harbor. The vessel management system will be active prior to the applicant beginning the proposed operations. To reduce potential risk of incident of vessel collision while in Grays Harbor, the vessel management system should act as follows.
  - Ensure vessel traffic is limited while a laden tank vessel is in the navigation channel.
  - Prohibit the transit of any other deep-draft vessels within the South Reach of the navigation channel (just off Westport) to Terminal 1 in both directions whenever a laden tank vessel is transiting within the same channel.
  - Include real-time Automatic Identification System tracking and monitoring.
- To reduce the risk of a fire or explosion from tank barges, the applicant will not receive or supply Bakken crude oil to tank barges unless the tank barges are able to inert their tanks when carrying Bakken crude oil.
- To reduce the risk of an incident, the applicant will coordinate with the Port and as a member of the Grays Harbor Safety Committee, work to develop and implement specific procedures for escorting, tethering, and emergency maneuvering to control laden tank vessels. The procedures must be drafted prior to the proposed operations beginning. These procedures should be included in the Grays Harbor Safety Plan. At a minimum, these must include the following elements.
  - Escort configurations and maneuvering characteristics of escorted tankers and tank barges.
  - Specific emergency connection and tethering procedures for connection of escort tugs to tankers and tank barges.
  - Specific maneuvers necessary for the escort tug to maintain control of the tanker while transiting Grays Harbor waters specifically during incidents of loss of propulsion or steering.
  - Appropriate safe speed of transit in Grays Harbor when escort tugs are tethered.
  - Guidelines for tanker or tank barge bridge team to rapidly recognize and respond to a loss of power or steering. By improving recognition and reaction time, the escort tug can more effectively steer the vessel through the navigation channel upon incident.
  - Requirement for a pretransit conference.
  - Refueling operations.

- To reduce the risk of an incident during vessel refueling, the applicant will ensure that any tank barges loaded with fuel for purposes of refueling vessels at the project site follow the navigation and safety mitigation measures for crude oil tank barges described in this section.
- To improve response times and increase coordination of responses, the applicant will develop and implement a program approved by Ecology to educate its tankers and tank barge customers on the reporting requirements for vessel incidents resulting in a threat of a spill under Revised Code of Washington 88.46.100, Notification of Vessel Emergencies Resulting in Discharge of Oil, prior to beginning the proposed operations.
- To improve response times and communication in the event of an incident that could affect commercial or recreational fishing, the applicant will develop a method for provide information on potential incidents to commercial and recreational fishing boats and will describe this measure in the oil spill contingency plan prior to beginning operations.

6.5.7.4 Voluntary Measures

- To reduce potential risk from tank car punctures and spills identified with use of DOT-111 tank cars for transport of Bakken crude oil, the applicant will not accept crude oil by rail unless the following actions occur.
  - The rail cars meet or exceed the new U.S. Department of Transportation specification 117 design or performance criteria.
  - Existing tank cars are retrofitted in accordance with the U.S. Department of Transportation-prescribed retrofit design or performance standard (80 *Federal Register* 26643).

6.5.7.5 Unavoidable and Significant Adverse Environmental Impacts

Impacts from an incident from any of the cumulative projects would likely result in unavoidable and significant adverse environmental impacts. As described in the risk analysis, the likelihood of an incident is low; however, the potential for significant impacts on the environment and human health in the case of an incident is high. The specific impacts would vary based on the location, type of liquid, amount spilled, and weather conditions. Examples of these impacts are described in Chapter 4, Section 4.7, *Impacts on Resources*. Existing regulatory requirements for the prevention, preparedness, and response to an incident and mitigation measures to reduce impacts are detailed above; however, no mitigation measures would completely eliminate the possibility of an incident from rail cars carrying crude oil or hazardous materials. No mitigation measures would completely eliminate the adverse consequences of an incident.

6.5.8 Extended Study Area

This section discusses potential cumulative impacts in the extended study area that would result from rail and vessel transport related to the cumulative projects.

In addition to the impacts addressed in Chapters 3, *Affected Environment, Impacts, and Mitigation*, and 4, *Environmental Health and Safety*, impacts related to increased rail and vessel traffic are described in Chapter 5, *Extended Rail and Vessel Transport*.

6.5.8.1 Rail Traffic

The rail traffic extended study area encompasses the BNSF main line tracks from Centralia, Washington (the eastern endpoint of the PS&P rail line) to the Bakken formation in North Dakota. The BNSF operates trains over 1,604 miles in Washington State, which represent almost 10% of its total system route miles. It is the largest rail operator in Washington, handling 1.4 million carloads in 2011 (Washington State Department of Transportation 2014a:37).

Anticipated increases in rail traffic related to the cumulative projects traveling to the project sites would account for a small percentage of BNSF rail traffic within Washington State. With approximately an additional 4.25 rail trips per day on average,[38] the new traffic would not have an impact on BNSF's rail network. As noted in Chapter 5, Table 5-8, existing daily traffic on the BNSF main line in Washington State is approximately 237 trains per day (Washington State Department of Transportation 2014b:Appendix 3-B).Even though the cumulative projects would add a relatively small amount of rail traffic, some impacts on other resources in the extended study area could occur. More specifically, the following impacts could occur as more trains, including the anticipated increases in Class I freight rail traffic, travel along the BNSF main line routes.

- Increased emissions resulting from more diesel trains.
- Increased noise at grade crossings and along the route.
- Increased potential for impacts on water quality and aquatic species as a result of a spill (Chapter 4, *Environmental Health and Safety*).
- Increased delay at grade crossings, including disruption to emergency vehicle response times.
- Increased risk of a derailment, oil spill, or other incident involving rail cars (Chapter 4, *Environmental Health and Safety*).

Stakeholders include but are not limited to the local, tribal, and regional governmental agencies along the BNSF main lines, as well as the regulatory agencies, Washington State Department of Transportation, Washington Utilities and Transportation Committee, FRA, and Pipeline and Hazardous Materials Safety Administration. These stakeholders and agencies should continue coordination to identify solutions (operationally or for larger capital improvement projects) to address current and future concerns related to increased rail traffic, vehicle delay, and safety at grade crossings, and other concerns specific to each community. This could include infrastructure improvements such as grade separations, additional grade-crossing protections, grade-crossing closures, and roadway improvements.

6.5.8.2 Vessel Traffic

The extended study area for vessel transport is the West Coast of the United States. Detailed information on vessel routes and traffic is included in Chapter 5, *Extended Rail and Vessel Transport*. Commercial vessel trips to principal West Coast ports in 2012 totaled 157,663 (National Oceanic and Atmospheric Administration 2014). Forecasted cumulative commercial vessel trips in Grays Harbor are anticipated to be approximately 738 vessel trips. These projects represent less than 1%

[38] As discussed in Section 6.4, *What methods were used to analyze cumulative impacts?* it is anticipated that 5.5 additional rail trips per day would occur on the project site related to operation of the cumulative projects.

of total West Coast port trips. The cumulative projects would have negligible impacts on vessel traffic in the extended study area.

Chapter 7
Economics, Social Policy, and Cost-Benefit Analysis

The City of Hoquiam State Environmental Policy Act (SEPA) policies and procedures (Hoquiam Municipal Code [HMC] 11.10.160) require that, in addition to the state rules adopted by reference (HMC 11.10.140), an environmental impact statement must address economic considerations, social policy implications, and the costs and benefits associated with the proposed action and the no-action alternative. Based on this regulatory requirement, this analysis focuses primarily on resources under the purview of the City of Hoquiam that could be affected by the proposed action alone.

This chapter is organized as follows.

- Section 7.1, *Economics,* provides the regional (state- and countywide) economic context for the proposed action and economic impacts.
- Section 7.2, *Social Policy,* presents impacts on elements related to social elements.
- Section 7.3, *Cost-Benefit Analysis*, provides an analysis of the costs and benefits of the proposed action, relevant to the City of Hoquiam.

7.1 Economics

This section describes the regional (state- and countywide) economic conditions in the study area, as well as the economic impacts that could result under the no-action alternative or as a result of construction and routine operation[1] of the proposed action.

7.1.1 What is the study area for economics?

The study area for economics consists of the Washington State economy and the Grays Harbor County[2] economy that could be affected by construction[3] and routine operation of the proposed action. Routine operation of the proposed action encompasses onsite operations, rail transport along the Puget Sound & Pacific Railroad (PS&P)[4] rail line, and vessel transport through Grays Harbor out to 3 nautical miles from the mouth of the harbor.

7.1.2 How were impacts on economic conditions evaluated?

This section describes the methods used to evaluate impacts.

[1] Chapter 4, *Environmental Health and Safety*, addresses the potential environmental impacts from increased risk of incidents (e.g., storage tank failure, train derailments, vessel collisions) and related consequences (e.g., release of crude oil or other proposed bulk liquids).

[2] For operation of the proposed action, the economic region was defined as Grays Harbor County, because most economic activity associated with operation is expected to occur there.

[3] For the construction phase, the economic region was defined as Washington State because most construction-related purchases are likely to occur within the state, but many of them would occur outside Grays Harbor County and the adjacent counties.

[4] The PS&P rail line refers to the rail line between Centralia and the project site.

Regional economic impacts of the proposed action were analyzed by ECONorthwest using the Impact Analysis for Planning Model (IMPLAN) as presented in Appendix O, *Census Block Group Data.* This analysis focused on the employment, income (including benefits), and economic output that would be generated in the region by the proposed action during construction and operation. Economic output measures the total value of economic transactions related to the proposed action. IMPLAN is a leading input-output modeling system that describes the flow of goods and services between industrial sectors in regions usually defined as a county, a group of counties, or a state. The IMPLAN databases contain county-level, inter-industry trade flows for hundreds of commodities estimated based on nationwide production functions; that is, relationships showing the average amounts of various goods and services required to produce a unit of each commodity. ECONorthwest customized the IMPLAN data based on proprietary information describing trade flows in Washington State and Grays Harbor County and on information about the proposed action provided by the applicant.

Input-output models estimate not only the employment and income generated to construct and operate a project (*direct* effects) but also the increased employment and income in industries linked to the project (*indirect* effects). The model also estimates the increased purchases that workers in the directly and indirectly affected industries make due to their increased income (*induced* effects). The sum of the direct, indirect, and induced effects is called the *total* effect, and the ratio of the total effect to the direct effect is called a *multiplier*.

7.1.3 What are the economic conditions in the study area?

This section describes the regional economic conditions that could be affected by construction and routine operation of the proposed action.

7.1.3.1 Regional Population

Between 2000 and 2012, the state population increased by 17% (Table 7-1). In 2010, Grays Harbor County ranked 17th in population out of Washington's 39 counties (U.S. Census Bureau 2014a). Although the county population increased by 6.7% between 2000 and 2012 (Table 7-1), it actually decreased by 1,105 individuals during the last 2 years of that period (U.S. Census Bureau 2014a). Table 7-1 presents regional population, labor force, income, unemployment, and poverty rates for 2000 and 2012.

Table 7-1. Population, Labor Force, Median Household Income, Unemployment Rate, and Poverty Rate for Washington and Grays Harbor County (2000 and 2012)

	Washington State			Grays Harbor County		
Statistic	2000	2012	Percent Change	2000	2012	Percent Change
Population	5,894,121	6,897,012	17.0	67,194	71,692	6.7
Labor force	2,979,824	3,556,836	19.4	30,120	31,514	4.6
Median household income ($)	45,776	57,573	25.8	34,160	42,057	23.1
Unemployment rate (%)	6.1	8.6	39.3	8.3	16.4	97.6
Poverty rate (%)	10.6	13.5	27.3	16.1	20.9	37.7

Source: U.S. Census Bureau 2014a and 2014b

7.1.3.2 Regional Income, Poverty, and Unemployment

In 2012, Washington ranked eighth in median household income among the 50 states. Its median household income exceeded that of all non-eastern-seaboard states, except Alaska (U.S. Census Bureau 2013). Although Washington is relatively affluent, its unemployment and poverty rates increased substantially between 2000 and 2012 (Table 7-1).

In 2012, Grays Harbor County ranked 34th in median household income among the state's 39 counties (Washington State Office of Financial Management 2014). Unemployment and poverty have recently become more prevalent in the County: approximately one in five County residents lived in poverty, and one in six members of the work force was unemployed in 2012 (Table 7-1). Grays Harbor County's per-capita income is substantially less than the statewide average, and it increased more slowly than in Washington between 2000 and 2012 (Table 7-2).

Table 7-2. Per-Capita Income in Washington State and Grays Harbor County (2003–2012)

Year	Washington State	Grays Harbor County
2003	34,620	24,663
2004	36,715	25,315
2005	37,651	26,150
2006	40,139	27,132
2007	42,845	28,566
2008	44,162	29,903
2009	42,112	29,391
2010	42,521	29,645
2011	44,420	30,963
2012	46,045	31,848
Percent change 2003–2012	33.3	29.1

Source: U.S. Bureau of Economic Analysis 2014

7.1.3.3 Regional Employment and Wages

Between 2002 and 2012, the state industries that increased fastest in statewide employment level were educational services; health care and social assistance; and professional, scientific, and technical services (Table 7-3). The industries that declined the fastest in employment in the state were mining, construction, and finance and insurance.

In Grays Harbor County, the industries that increased fastest in employment between 2002 and 2012 were management, administrative and waste management, and real estate and rental and leasing services (Table 7-3). The industries in which employment declined most rapidly were construction, military, and other services. More industries had declining employment than increasing employment.

Table 7-3. Employment[a] by Place of Work in Washington State and Grays Harbor County by Industry (2002 and 2012)

	Washington State			Grays Harbor County		
Sector	**2002**	**2012**	**Percent Change[b]**	**2002**	**2012**	**Percent Change[b]**
Farming	44,116	52,776	19.6	590	766	29.8
Forestry, fishing, and related activities	24,924	27,696	11.2	(D)	(D)	--
Mining	3,063	2,158	(29.6)	(D)	(D)	--
Utilities	4,524	4,913	8.6	16	(D)	--
Construction	160,441	143,496	(10.6)	1,705	1,339	(21.5)
Manufacturing	286,033	280,554	(1.9)	3,574	3,079	(13.9)
Wholesale trade	116,491	124,363	6.7	852	765	(10.2)
Retail Trade	309,158	322,363	4.3	3,969	3,425	(13.7)
Transportation and warehousing	85,295	89,301	4.7	902	(D)	--
Information	93,555	105,535	12.8	222	275	23.9
Finance and insurance	101,513	94,517	(9.3)	922	1,055	14.4
Real estate and rental and leasing services	48,565	45,918	(5.4)	841	1,128	34.1
Professional, scientific, and technical services	140,060	173,116	23.6	1,005	1,007	0.2
Management	30,286	36,318	19.9	36	92	155.5
Administrative and waste management	123,101	143,031	16.2	628	925	47.3
Educational services	41,954	52,981	26.3	112	117	4.5
Health care and social assistance	271,964	340,181	25.1	2,390	2,831	18.4
Arts, entertainment, and recreation	41,986	46,452	10.6	483	424	(12.2)
Accommodation and food services	206,171	232,890	12.9	2,432	2,317	(4.7)
Other services	145,889	146,708	0.6	2,118	1,815	(14.3)
Federal civilian	69,300	73,258	5.7	215	212	(1.4)
Military	75,587	81,956	8.4	288	240	(16.7)
State government	141,344	149,352	5.7	1,243	1,256	1.0
Local government	300,536	319,886	6.4	4,844	4,720	(2.6)
Total	**2,865,856**	**3,089,759**	**7.8**	**31,203**	**29,872**	**(4.3)**

Notes:
Source: U.S. Bureau of Economic Analysis 2014
(D) Not shown to avoid disclosure of confidential information
[a] Includes full- and part-time employees and proprietors.
[b] Negative changes shown in parentheses.

Countywide average wages are lower than the statewide average, and they increased more slowly between 2004 and 2012 compared to statewide (Table 7-4).

Table 7-4. Average Weekly Wages for Washington and Grays Harbor County (2004 and 2012) ($)

Year	Washington State	Grays Harbor County
2004	757	574
2012	999	686
Percent Change 2004–2012	32.0	19.5

Source: U.S. Bureau of Labor Statistics 2015

7.1.4 What are the potential impacts on economic conditions?

This section describes impacts on economic conditions that could occur in the study area. Potential impacts of the no-action alternative are described first, followed by potential impacts of the proposed action.

7.1.4.1 No-Action Alternative

Under the no-action alternative, the applicant would continue to operate its existing facility as described in Section 2.1.2.2, *Existing Operations*. Although the proposed action would not occur, it is assumed that growth in the region would continue under the no-action alternative, which could lead to development of another industrial use at the project site within the 20-year analysis period (2017 to 2037). Such development could result in in impacts similar to those described for the proposed action.

7.1.4.2 Proposed Action

This section describes the impacts that could occur in the study area as a result of the construction and routine operation of the proposed action. First, this section describes impacts from construction of the proposed action. It then describes impacts of routine operation of the proposed action.

Construction

As described in Chapter 2, *Proposed Action and Alternatives*, construction of the proposed action would likely be completed in two separate phases. It is anticipated that Phase 1 could begin in 2016 and would last 18 months. The start date for Phase 2 is unknown but is anticipated to last approximately 3 to 4 months. Construction of Phase 1 is anticipated to cost $45.8 million and Phase 2 is estimated to cost an additional $20.3 million for a total construction cost of $66.1 million.

Construction of the proposed action would temporarily stimulate the economy through purchases of materials, supplies, equipment, and services; payroll to construction workers; and related indirect and induced effects. Direct purchases of goods and services used to construct the proposed facilities would require the vendors providing these products to increase spending on the inputs they need to operate. For example, construction companies engaged in building industrial infrastructure would probably need to buy additional heavy equipment. Such purchases by directly affected businesses represent the *indirect effects* of the proposed action. *Induced effects* result when workers and proprietors who receive additional income from work generated by the proposed action spend that additional income on consumer goods and services within the region.

As indicated by the IMPLAN analysis (Appendix O, *Census Block Group Data*), approximately $9.4 million of Phase 1 total construction costs ($45.8 million) would go to labor spending (e.g., construction worker salaries and benefits) associated with the creation of approximately 73 direct construction jobs in Washington and a total of 270 jobs throughout the state economy (Table 7-5). Of the total Phase 1 construction costs, the remaining $36.4 million would go to nonlabor spending (e.g., equipment and materials purchases). Businesses classified by IMPLAN as "the construction of other new nonresidential structures industry" would receive most of the construction spending.

Of the $9.4 million to go to labor spending, approximately $9.0 million (96%) is estimated to be spent in Washington (Table 7-5). Of the $36.4 million to go to nonlabor spending, it is estimated approximately $12.9 million (35%) would be spent on construction commodities such as materials, supplies, equipment, and services in Washington. The remaining $23.5 million (65%) would be spent out of state. The relatively low share of in-state nonlabor spending reflects the need to import specialized equipment manufactured outside Washington. The estimated direct, indirect, and induced employment, income, and output effects associated with Phase 1 construction spending that would occur in Washington State are shown in Table 7-5. Income and output levels are expressed in 2013 dollars per year.

Table 7-5. Estimated Economic Labor Costs from Phase 1 Construction—Proposed Action (2013 dollars)

Impact	Employment (jobs)	Labor Income and Benefits	Economic Output
Direct	73	$9,030,000	$21,919,000
Indirect	105	$6,597,000	$16,795,000
Induced	92	$4,311,000	$12,312,000
Total	270	$19,938,000	$51,025,000
Multiplier[a]	3.57	2.09	2.30

Source: Appendix O, *Census Block Group Data*

In addition to these economic impacts, construction of the proposed action would result in various tax revenues accruing to state and local governments. As shown in Table 7-6, the first phase of construction was estimated to generate approximately $2.7 million in property, sales, and business and occupation tax revenues.

Table 7-6. Estimated Tax Revenues from Phase 1 Construction—Proposed Action (2013 dollars)

Property Tax	Sales Tax	Business and Occupation Tax	Total
$93,600	$3,122,100	$58,400	$2,655,700

Source: Appendix O, *Census Block Group Data*

As mentioned above, construction of Phase 2 is estimated to cost an additional $20.3 million. The economic impacts associated with Phase 2 construction would be similar to but slightly less than construction of Phase 1.

Operations

The annual economic output of the proposed action in Grays Harbor County was estimated at $77.8 million (Table 7-7). This includes onsite operation of the proposed action and rail and vessel

operations to and from the project site by rail and vessel operators. This amount does not include the value of the commodities (e.g., new bulk liquids) that would be shipped through the Port of Grays Harbor (Port), which, for this analysis, comprise pass-through costs with no economic impacts. The annual economic output includes annual operating costs of Imperium Terminal Services (applicant), PS&P, and vessel operators related to the proposed action, business taxes, and net business income.

At full buildout, the proposed action would generate an estimated 103 direct jobs in Grays Harbor County associated with onsite operation of the proposed action (by the applicant), rail transport (by PS&P), and vessel transport (by vessel operators). The proposed action would generate an estimated 207 jobs throughout the County's economy. These jobs would account for $9.2 million in annual direct labor income and benefits, and $13.1 million in total annual labor income and benefits throughout the County's economy (Table 7-7).

The annual operating of the proposed facilities (by the applicant), rail transport (by PS&P), and vessel transport (by vessel operators) was estimated at $18.4 million. One-third of this spending ($4.5 million) would be attributed to the applicant, and the remaining two-thirds ($8.0 million) would be attributed to the rail and vessel transport operators. Of the total spending, $9.2 million (50%; Table 7-7) would be paid as income or benefits to employees and proprietors with the remainder going to non-labor expenditures.

The difference between the annual economic output and annual operating costs would consist primarily of business taxes and net business income. A substantial share of the applicant's net business income would probably be allocated to retire debt incurred during the construction phase. Essentially, all business taxes and net business income related to onsite operations and income earned by rail and vessel operators would leave Grays Harbor County and would not result in regional employment or income. The regional economic effects of operation of the proposed action are shown in Table 7-7, with income and output levels expressed in 2013 dollars per year.

Table 7-7. Estimated Economic Impacts in Grays Harbor County of Operations at Full Buildout—Proposed Action (2013 dollars)

	Employment (jobs)	Labor Income and Benefits	Economic Output
Direct	103	$9,169,000	$77,813,000
Indirect	60	$2,416,000	$7,925,000
Induced	45	$1,487,000	$5,051,000
Total	207	$13,071,000	$90,789,000
Multiplier[a]	2.01	1.42	1.17

Source: Appendix O, *Census Block Group Data*

[a] The multipliers for operation of the proposed action are smaller than those for construction primarily because the study area for operation is much smaller (Grays Harbor County) and the industries that would be most affected by operation are, on average, less labor-intensive and have lower wages.

In addition to these economic impacts, operation of the proposed action was estimated to generate $1.6 million in increased annual property, sales, and business and occupation tax revenues at full buildout (Table 7-8).

Table 7-8. Estimated Annual Tax Revenues Generated by Operations at Full Buildout—Proposed Action (2013 dollars)

Property Tax	Sales Tax	Business and Occupation Tax	Total
$785,900	$381,700	$473,800	$1,641,400
Source: Appendix O, *Census Block Group Data*			

7.2 Social Policy

The social policy analysis considers elements of community and social structure that could be affected by the proposed action, including community cohesion, community welfare, population growth, and minority and low-income communities.

- **Community cohesion** is the ability of people to communicate and interact with each other in ways that lead to a sense of community, as reflected in a neighborhood's ability to function and be recognized as a singular unit (Washington State Department of Transportation 2014). In general, community cohesion is affected by elements that tend to divide communities, such as railroads, highways, and industrial facilities not accessible to the public.
- **Community welfare** refers to the physical health and mental well-being of individuals in a community.
- **Population growth** refers to the increase in the number of people that reside in a country, state, county, or city.
- **Minority and low-income communities** refer to those localized communities that have a higher percentage of residents in this category than the county in which they reside.

This section describes the existing conditions related to community cohesion, community welfare, population, and minority and low-income populations. It then describes impacts on these elements that could result under the no-action alternative or as a result of the construction and routine operation of the proposed action. This section also considers if impacts resulting from the proposed action could disproportionately affect minority and low-income communities.

7.2.1 What is the study area for social policy?

The study area for social policy consists of the communities surrounding the project site that could be affected by construction and routine operation of the proposed action. The study area also includes the communities that could be affected during routine rail transport along the Puget Sound & Pacific Railroad (PS&P)[5] rail line and vessel transport through Grays Harbor.

7.2.2 How were impacts on social policy evaluated?

This section describes the sources of information and methods used to evaluate impacts.

7.2.2.1 Information Sources

The analysis used information from the following sources.

[5] The PS&P rail line refers to the rail line between Centralia and the project site.

- Public scoping comments
- Relevant land use plans and mapping
- U.S. Census data
- Interviews with local land use planners

7.2.2.2 Impact Analysis

Impacts of the proposed action on social policy elements were evaluated qualitatively using information from the sources described above and the analysis of impacts on the natural and built environment in Chapter 3, *Affected Environment, Impacts, and Mitigation*.

- **Community cohesion.** The evaluation of impacts on community cohesion considered how the proposed action would divide a neighborhood, isolate part of a neighborhood, or separate residents from public services by changing accessibility.
- **Community welfare.** The evaluation of impacts on community welfare considered how impacts of the proposed action described in Chapter 3 could affect human health and welfare (e.g., physical health, mental well-being, property values) in the study area.
- **Population growth.** Impacts on population growth were evaluated based on projected employment from construction and operation of the proposed action described in Section 7.1, *Economics*.
- **Minority and low-income communities.** The analysis of impacts on minority and low-income communities involved compiling minority and low-income data for the U.S. census block groups in the study area and evaluating whether the impacts would affect minority and/or low-income communities. This means considering if impacts would occur or occur in greater magnitude in areas where these populations were concentrated.

  For the purposes of this analysis, a population was considered a minority or low-income population if the percentage of minority or low-income individuals in any given census block group was greater[6] than the percentage of that population at the county level[7], which provides for a conservative analysis. For this analysis, *minority* populations include all racial groups other than white (defined as not Hispanic or Latino), and *low-income* populations include those living below poverty.

7.2.3 What are the existing conditions related to social policy in the study area?

This section describes the existing conditions related to community cohesion, community welfare, population growth, and minority and low-income in the study area that could be affected by construction and routine operation of the proposed action.

[6] For comparison, the U.S. Environmental Protection Agency considers impacts on minority populations to be disproportionate if the minority population exceeds 50% of the study area population or if the minority population percentage of the study area is meaningfully greater than the minority population percentage in the general population or the reference area the study area (Council on Environmental Quality 1997).

[7] The study area spans three counties; the census block groups were evaluated against the county in which they are located.

7.2.3.1 Community Cohesion

This section describes existing dividing elements, such as railroads, highways, and industrial facilities not accessible to the public, near the project site, along the PS&P rail line, and along the shoreline of Grays Harbor.

Project Site

The project site is located within the city limits of Hoquiam and Aberdeen along the industrial waterfront at the Port. Land on and directly surrounding the project site is designated and zoned for industrial use (Chapter 3, Section 3.8, *Land and Shoreline Use*). The industrial area extends several miles north and south of the project site along the shoreline. The PS&P rail line borders this industrial area to the north and east, dividing the industrial area from high-density residential, recreational, and other uses to the north and northeast. The rail line and industrial area are dividing elements near the project site in that they separate these residential areas from the Grays Harbor shoreline. However, physical and visual access to Grays Harbor is provided via the 28th Street Boat Ramp and Viewing Tower located north of the project site.

US Route 101 (US 101) is north of the project connecting Hoquiam to the west and Aberdeen to the east. Local road access to the project site is provided via Port Industrial Road at the intersection with West 1st Street.

PS&P Rail Line

The PS&P rail line links the densely populated cities of Hoquiam and Aberdeen (to the west) and Centralia (to the south and east), largely following the Chehalis River; in between, development is much less dense. Land uses mostly consist of agricultural fields and forested open space interspersed with smaller cities and communities, including (west to east) Junction City, Central Park, Alder Grove, City of Montesano, Brady, Satsop, City of Elma, Malone-Porter, City of Oakville, the Chehalis Reservation, Rochester, Grand Mound, and Fords Prairie (Chapter 2, Figure 2-1).

The PS&P rail line travels along the outskirts of most communities; however, it intersects Centralia, Fords Prairie, Ground Mound, Rochester, Elma, and Aberdeen, where it divides portions of these communities. When a train is traveling through this corridor, access from one side of the town to the other can be temporarily blocked. With the exception of impacts in Aberdeen, the delay typically lasts the duration of the train passing (approximately 3 minutes with some periods of longer delay in Centralia due to slower speed restrictions).

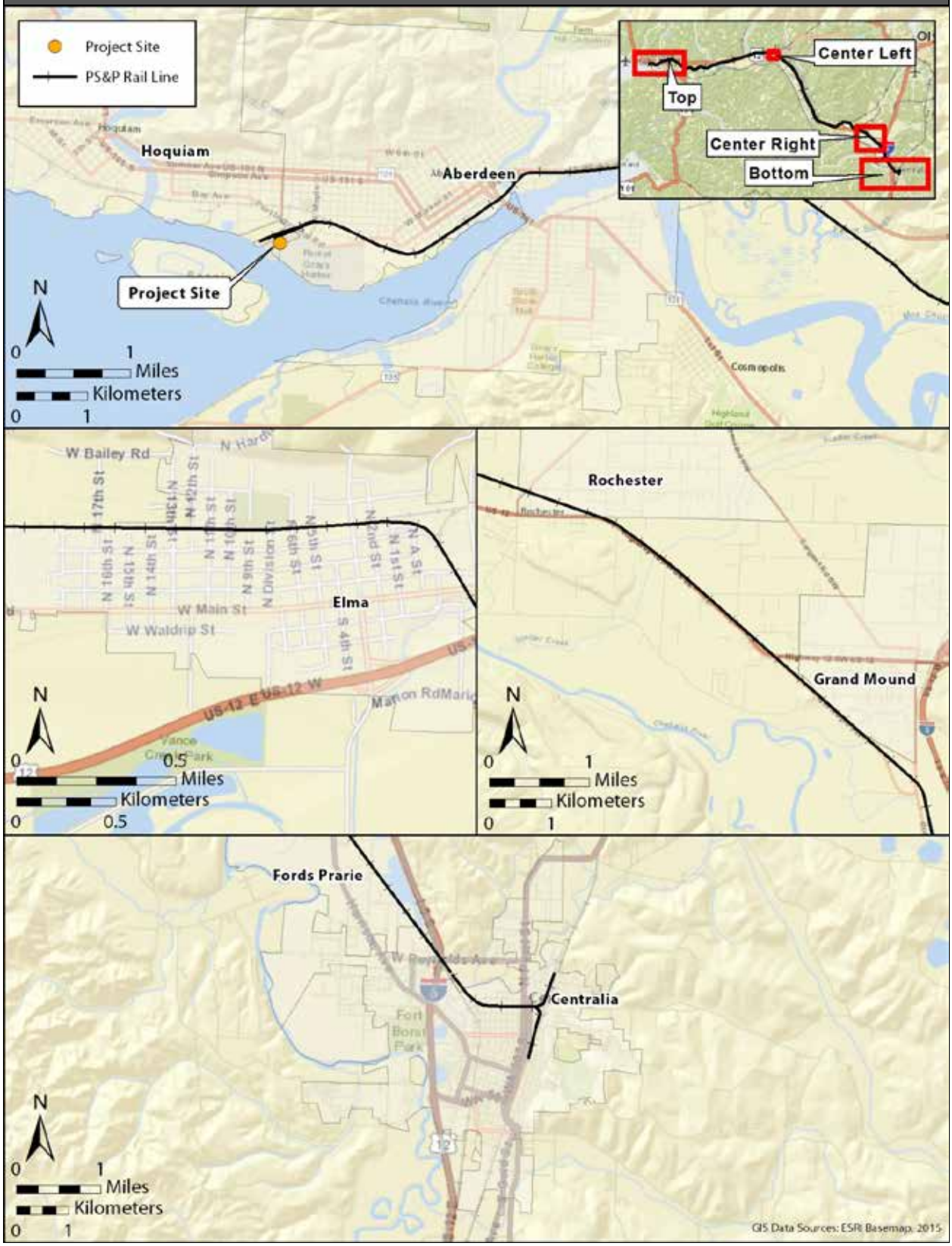
Elsewhere along the rail line are additional locations where access is completely blocked by a passing train, meaning there are no alternative routes. These access limitations are summarized below (Figure 7-1).

- In Centralia, from north to south, the PS&P rail line cuts through an industrial district, crosses the Skookumchuck River, and traverses a variety of mid- to high-density residential and commercial uses. Interstate 5 also runs north-south along the western side of the city.
- In Fords Prairie, the PS&P rail line runs through the northern part of the city, bisecting a large commercial complex from some scattered residential development. During the passing of the train, access into the warehouse area to the north is temporarily blocked.
- In the Rochester and Grand Mound area, the PS&P rail line bisects scattered residential areas with most development occurring to the north of the rail line. Some isolated areas, including

primarily agricultural development and rural residential uses, are temporarily blocked from access when trains pass.

- From Rochester to Elma, access is temporarily limited in some scattered areas. These areas mostly consist of agricultural development and rural residential land uses.
- In Elma, the PS&P rail line runs through the length of the community and separates the northern portions, primarily residential development, from the more concentrated residential and commercial development to the south. When a train is passing, access to the Lloyd Murray Park is temporarily blocked.
- From Elma into Aberdeen, a passing train temporarily blocks access to some smaller groupings of residential land uses.
- In Aberdeen, the PS&P rail line mostly splits industrial uses to the south and most other uses (mainly commercial and residential) to the north. East of the Wishkah River; however, the rail line divides residential and commercial uses on the north from a popular commercial area (Olympic Gateway Plaza) on the south. When a train is passing, access into the Olympic Gateway Plaza is blocked (Chapter 3, Section 3.16, *Vehicle Traffic and Safety*).

Figure 7-1. Communities Intersected by the PS&P Rail Line



Grays Harbor

Lands surrounding Grays Harbor are relatively sparsely populated outside of the cities and communities. Communities along the harbor include Cosmopolis, Westport, Cohassett Beach, and Ocean Shores. General land uses surrounding the harbor include residential, industrial, commercial, transportation/communications/utilities, recreation, resource production (i.e., agriculture, fishing, and mining activities and designated forest land), and undeveloped land (Chapter 3, Figure 3.8-1). Generally, development is more concentrated on the eastern and western sides of the harbor and most undeveloped land is located along the northern and southern sides.

Grays Harbor encompasses many recreational areas, including several state and local parks and designated wildlife areas. Fishing, shellfishing, bird and wildlife viewing, hiking, and boating are popular recreational activities throughout the harbor. Most of Grays Harbor's recreational areas are on the western half of the harbor in and near the northern and southern peninsulas.

Besides the industrial area along the eastern end of the harbor in which the project site is located and along where the rail line runs, there are no major dividing elements along the Grays Harbor shoreline. Although present, US 101 and State Route (SR) 109 are not dividing elements because they are accessible from local roadways.

As described in Chapter 3, Section 3.17, *Vessel Traffic*, Grays Harbor experiences many forms of vessel activity, including large commercial vessels that transit the harbor via the Grays Harbor Navigation Channel destined for Port terminals and other private wharves further east along the Chehalis River. Commercial fishing vessels also tend to congregate along the navigation channel east of the Hoquiam River, and recreational fishing and pleasure boats move throughout the harbor, mostly in the summer. The navigation channel could be considered a dividing element among commercial fishers and recreationalists using the harbor, because the latter vessels must make way for the large commercial vessels whose transit through the harbor is restricted to the navigation channel. As noted in Chapter 3, Section 3.10, *Recreation*, Section 3.12, *Tribal Resources*, and 3.17, *Vessel Traffic*, existing deep-draft vessel traffic currently does cause some disruption to recreation boaters and fishers and tribal and commercial (treaty and nontreaty tribal) fishing.

7.2.3.2 Community Welfare

Community welfare analysis identifies the factors that influence the existing sense of welfare in the study area, such as living in a healthy and safe environment and relatively easy access to public amenities and services.

Project Site

As noted in Chapter 3, *Affected Environment, Impacts, and Mitigation*, in general, project site does not have significant documented concerns with air quality or water quality. Easy access to the harbor and the Chehalis River provides recreational and commercial opportunities. There are also recreational facilities and public facilities in Hoquiam and Aberdeen, such as ballparks, boat launches, restaurants, and other businesses. However, closest to the project site, there are areas that experience some exposure to increased noise and environmental health and safety risks associated with the existing industrial facilities. These land uses are described in Chapter 3, Section 3.8, *Land and Shoreline Use*.

PS&P Rail Line

The PS&P rail line links the densely populated cities of Hoquiam and Aberdeen (to the west) and Centralia (to the south and east), largely following the Chehalis River. In between, land uses generally consist of agricultural fields and forested open space interspersed with smaller cities and communities. In general, environmental conditions along the PS&P are good. There are no known concerns with air quality or water quality. There are numerous recreational facilities and public facilities in the cities along the rail line. However, residents are exposed to noise and environmental health and safety risks associated with existing rail operations, primarily related to train horn noise and some risks of incidents. Existing noise conditions are discussed in Chapter 3, Section 3.7, *Noise and Vibration*, and existing safety risks are addressed in Chapter 4, *Environmental Health and Safety*. Additionally, there are areas where rail operations result in increased vehicle delay and limited vehicle access, primarily in East Aberdeen and around the project site. These limitations are discussed in Section 7.2.3.1, *Community Cohesion*, and in Chapter 3, Section 3.16, *Vehicle Traffic and Safety*.

Grays Harbor

As described in Section 7.2.3.1, *Community Cohesion*, lands surrounding the harbor are relatively sparsely populated outside of the cities and communities. In general, environmental conditions around the harbor are good. There are no known concerns with air quality or water quality. There are numerous recreational facilities and public facilities in the surrounding cities. Views of Grays Harbor are relatively intact and are available from land- and water-based vantages. Numerous recreational and wildlife areas are located around the bay with views of the water. Additionally, water-based views are available from recreational, commercial, and industrial vessels. Views in the region vary based on viewers' location in the landscape. Many views are of high visual quality, featuring the harbor and rivers, tidal areas, forested hillsides, and relatively low levels of development. However, other views are somewhat degraded and include industrial operations and infrastructure juxtaposed against the forested hillsides and waterfront.

The shoreline of Grays Harbor provides opportunities for hiking, biking, picnicking, wildlife viewing, bird watching, and hunting at the numerous state and city parks and designated wildlife areas that surround the harbor. Miles of public shoreline with multiple public access options provide opportunities for beachcombing and shellfishing; public boat launches provide access for recreational fishing and boating. Wave riding and surfing are other popular activities near the south jetty.

However, there is increased exposure to some risks associated with existing vessel operations. This includes the low potential for incidents, as discussed further in Chapter 4, *Environmental Health and Safety*, and some low level of disturbance to recreational boaters, commercial fishers, and tribal fishers in the study area, as discussed in greater detail in Chapter 3, Section 3.10, *Recreation*, Section 3.12, *Tribal Resources*, and Section 3.17, *Vessel Traffic*.

7.2.3.3 Population Growth

This section describes recent population growth in the study area. As noted in Section 7.1.3.1, *Regional Population*, Washington State's population increased between 2000 and 2012 by 17% and Grays Harbor County's population increased by 6.7% (Table 7-9). Over the same period, population increased in most of the cities and communities in the study area. The exceptions are Hoquiam

(-2.9%), Westport (-5.0%), Junction City (-77.5%), Elma (-0.6%), and Fords Prairie (-0.1%) (Table 7-9).

Table 7-9. Population Growth[a] in Washington, Grays Harbor County, and Surrounding Communities (2000 and 2012)

Population	2000	2012	Percentage Change
Hoquiam	8,987	8,726	-2.9
Aberdeen	16,461	16,896	2.6
Westport	2,137	2,030	-5.0
Ocean Shores	3,836	5,584	45.6
Cosmopolis	1,595	1,600	0.3
Junction City	80	18[a]	-77.5
Central Park	2,558	2,685[a]	5.0
Montesano	3,312	3,976	20.0
Brady	645	676[a]	4.8
Satsop	619	675[a]	9.0
Elma	3,049	3,030	-0.6
Malone-Porter	473	1,825[a]	285.8
Oakville	233	663	184.5
Rochester	1,829	2,388[a]	30.6
Grand Mound	1,948	2,981[a]	53.0
Fords Prairie	1,961	1,959	-0.1
Centralia	14,742	16,611	-13
Study area communities total	51,723	57,725	11.0
Grays Harbor County	67,194	71,692	6.7
Washington	5,894,121	6,897,012	17.0

Source: U.S. Census Bureau 2013 unless otherwise noted
[a] U.S. Census Bureau 2010

7.2.3.4 Minority and Low-Income Populations

This section identifies minority and low-income populations in the study area based on the census block group data (U.S. Census Bureau 2014c). Of the 57 census block groups in the study area, 31 have minority populations that exceed their respective county levels (minority populations account for 19.1% of the Grays Harbor population, 14.4% of the Lewis County population, and 21.9% of the Thurston County population), ranging from 15.5 to 56.8% of the total population. Table 7-10 presents the average percentage of populations for each element of the study area, project site, PS&P rail line, and Grays Harbor, compared to area counties. Appendix P, *Census Block Group Data*, presents minority and poverty data for each block group in the study area.

In addition, 25 of the 57 census block groups in the study area have low-income populations that exceed their respective county levels (low-income populations account for 19.0 % of the Grays Harbor population, 15.4% of the Lewis County population, and 11.7% of the Thurston County population), ranging from 17.0 to 57.6%. This information is also summarized in Table 7-10 with more information for all census block groups presented in Appendix P, *Census Block Group Data*.

Overall, 39 of the 57 census block groups in the study area are considered minority and/or low-income populations for the purposes of this analysis (Figure 7-2). Relative to the project site, PS&P rail line, and Grays Harbor shoreline, these populations occur as follows.[8]

- Nearest the project site, all three of the census block groups are minority and/or low income.
- Along the PS&P rail line, 31 of the 43 (or 72%) census block groups are minority and/or low income. These populations occur along almost the entire length of the line with the exception of a small portion of Rochester (in Thurston County) and the area between Satsop and Montesano.
- Along the shoreline of Grays Harbor, 15 of the 22 (or 68%) census block groups are minority and/or low income, primarily concentrated around Ocean Shores, Hoquiam, Aberdeen, Cosmopolis, and along the southern shore of the harbor.

[8] Some census block groups are considered with respect to more than one of the study area features (i.e., project site, PS&P rail line, and Grays Harbor shoreline).

Table 7-10. 2013 Minority Populations and Poverty Status

Census Block Groups or Area	Average Percentage of Population that is a Minority Population	Comparison to Grays Harbor County Average Minority Population	Comparison to Lewis County Average Minority Population	Comparison to Thurston County Average Minority Population	Comparison to Washington State Average Minority Population	Average Percentage of Population Below Poverty Level[a]	Comparison to Grays Harbor County Average Low-Income Population	Comparison to Lewis County Average Minority Population	Comparison to Thurston County Average Low-Income Population	Comparison to Washington State Average Low-Income
Study area	20.0	0.9% higher	5.6% higher	1.9% lower	2.7% lower	17.8	1.2% lower	2.4% higher	6.1% higher	1.4% lower
Project site	26.9	7.8% higher	12.5% higher	5.0% higher	4.2% higher	31.6	12.6% higher	16.2% higher	19.9% higher	12.4% higher
PS&P rail line	21.1	2.0% higher	6.7% higher	0.8% lower	1.6% lower	18.1	0.9% lower	2.7% higher	6.4% higher	1.1% lower
Grays Harbor shoreline	21.6	2.5% higher	7.2% higher	0.3% lower	1.1% lower	21.1	2.1% higher	5.7% higher	9.4% higher	1.9% higher
Grays Harbor County	19.1	--	4.7% higher	2.8% lower	3.6% lower	19.0	--	3.6% higher	7.3% higher	0.2% lower
Lewis County[b]	14.4	4.7% lower	--	7.5% lower	8.3% lower	15.4	3.6% lower	--	3.7% higher	3.8% lower
Thurston County	21.9	2.8% higher	7.5% higher	--	0.8% lower	11.7	7.3% lower	3.7% lower	--	7.5% lower
Washington State	22.7	3.6% higher	8.3% higher	0.8% higher	--	19.2	0.2% higher	3.8% higher	7.5% higher	--

Source: U.S. Census Bureau 2014c

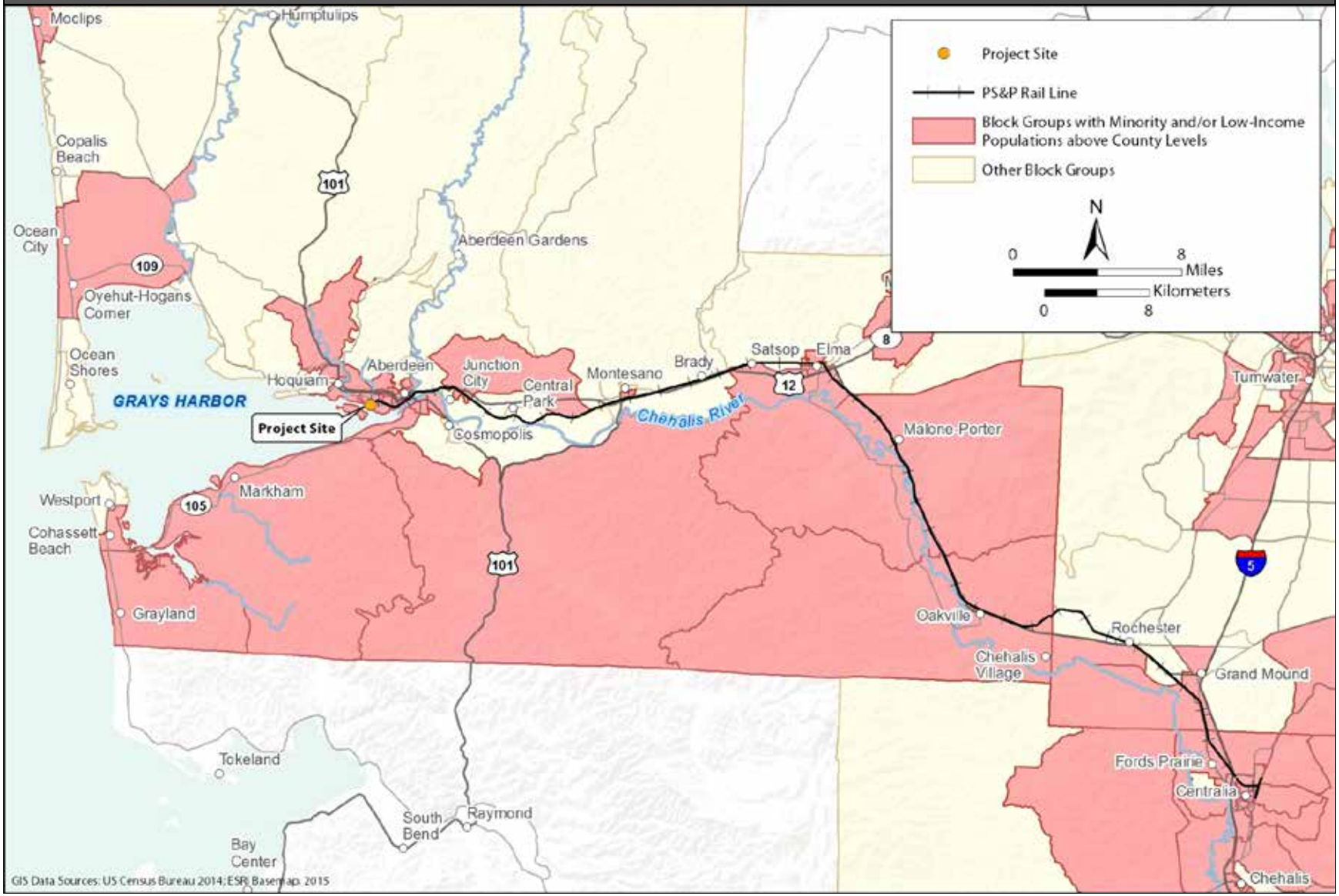
Table includes average percentage of populations for each element of the study area, project site, PS&P rail line, and Grays Harbor, compared to area counties.

[a] Percentage of individuals with incomes below poverty level, as established by the U.S. Census Bureau.

[b] Lewis County numbers are provided for comparison with census block groups in and near Centralia.

[c] Thurston County numbers are provided for comparison with census block groups in and near Rochester and Grand Mound.

Figure 7-2. Minority and Low-Income Populations in the Study Area



7.2.4 What are the potential impacts on social policy?

This section describes impacts on social policy that could occur in the study area. Potential impacts of the no-action alternative are described first, followed by potential impacts of the proposed action.

7.2.4.1 No-Action Alternative

Under the no-action alternative, the applicant would continue to operate its existing facility as described in Section 2.1.2.2, *Existing Operations*. Operations of this facility would continue to result in some levels of noise and air emissions and risk of hazardous materials releases (Chapter 3, *Affected Environment, Impacts, and Mitigation*). In addition, it is assumed that growth in the region would continue under the no-action alternative, which could lead to development of another industrial use at the project site within the 20-year analysis period (2017 to 2037). Although potential future uses were not analyzed, depending on the type of development, impacts similar to those described for the proposed action could occur.

7.2.4.2 Proposed Action

This section describes the impacts that could occur in the study area as a result of construction and routine operation of the proposed action. First, this section describes impacts from construction of the proposed action. It then describes impacts of routine operation at the project site and of rail and vessel transport to and from the project site.

Construction

Community Cohesion

The project site is located in an existing industrial area and construction of the proposed action would not bisect, disrupt, or isolate any established communities or change the existing community character, nor would it require relocating any residences or businesses. As described in Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, transport of materials and workers to and from the project site during construction is not expected to result in a substantial increase in traffic that could adversely affect the level of service of area roadways. Moreover, increased traffic related to construction of the proposed action would occur over a relatively short period (up to 18 months).

Community Welfare

Construction of the proposed action would affect community welfare if it were to substantially degrade air quality, increase noise, reduce access to parks and recreational uses, or reduce property values.

As described in Chapter 3, Section 3.2, *Air*, construction of the proposed action would result in emissions of criteria pollutants; however, these emissions are not expected to cause a significant contamination of the air and are unlikely to affect sensitive receptors surrounding the project site. Construction of the proposed action could result in emissions of toxic air pollutants, primarily associated with diesel particulate matter, a known human carcinogen. The construction-related emissions would be short-term and intermittent, with total diesel particulate matter emissions of less than 0.17 ton per year, which would be less than 0.2% of total 2011 diesel particulate matter emissions for Grays Harbor County (9.5 tons per year) (Washington State Department of Ecology

2014). Off-site exposure would likely be well below any level of concern based on the level considered acceptable for permitting new stationary sources of toxic air pollutants in Washington State.

As discussed in Chapter 3, Section 3.7, *Noise and Vibration*, construction of the proposed action would result in a temporary increase in daytime[9] noise and vibration from construction equipment operations. While construction noise would likely be audible in nearby residential areas and recreational uses, the levels would relatively low level and are not expected to adversely affect the surrounding these areas.

As described in Chapter 3, Section 3.10, *Recreation*, construction activities, including the transport of workers and materials to the project site, would not disrupt access to nearby recreation uses, including the 28th Street Boat Ramp and Viewing Tower.

Construction can also affect community welfare by temporarily lowering property values during construction. Specifically, potential buyers may find a property less attractive if views are altered by the visible and audible presence of construction equipment and activity. However, as noted in Chapter 3, Section 3.9, *Aesthetics, Light, and Glare*, views of the project site by residents are relatively limited and consist of elements that are already industrial in nature (e.g., large storage tanks, rail-loading equipment, biodiesel production facility).

Population Growth

Construction of the proposed action could affect population growth, housing, or relocation if construction workers were to move from outside of the area. Because the period of construction is relatively short (up to 18 months), it is expected that construction workers would commute from nearby communities. Therefore, construction of the proposed action would not result in the permanent relocation of workers from outside the study area, displacement of local residents, or the requirement for additional housing.

Minority and Low-Income Populations

As shown in Table 7-10, minority and low-income populations in the census block groups near the project site are much higher (7.8 and 12.6%, respectively) than Grays Harbor County levels. Because construction-related impacts described above would be relatively low and would only last during the construction period, construction of the proposed action is not anticipated to significantly and adversely affect these populations.

Operations

Community Cohesion

Operation of the proposed action would affect community cohesion if activities were to bisect, disrupt, or isolate any established communities or change the existing community character, such as by requiring the relocation of residences or businesses.

[9] No nighttime construction is proposed.

Onsite

Onsite operation of the proposed action would not require acquisition of new properties that would require relocating any residences or businesses, nor would it change the existing community character. The project site is located in an existing industrial area and the proposed facilities are consistent with the existing facilities at the project site.

Onsite operation of the proposed action would affect community cohesion if it were to block or obstruct access to important community resources. Although onsite activities would occur within the boundaries of the existing industrialized site, loading of tank vessels at the Terminal 1 dock could disrupt fishing activities adjacent to the dock.

As described in Chapter 3, Section 3.12, *Tribal Resources*, and Section 3.17, *Vessel Traffic*, onsite operations would reduce access to fishing areas immediately adjacent to the dock as result of increased frequency of vessels docked at the Terminal 1 berth.

As described in Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, onsite operation of the proposed action would result in additional employee vehicle trips to and from the project site. However, this increase would be minimal and would not noticeably affect surrounding roadways. Operations related to bringing rail cars onto the project site are addressed below under *Rail*.

Although there would be increased development and activity under the proposed action, the project site and surrounding area are already developed for industrial uses. In general, the increased activity occurring at the project site would be similar to the no-action alternative.

Rail

As described in Chapter 3, Section 3.15, *Rail Traffic*, operation of the proposed action at maximum throughput would add approximately two unit train trips[10] per day on average (730 per year maximum) along the PS&P rail line to approximately three train trips per day (1,235 per year) under the no-action alternative. Although the PS&P rail line is an existing facility, the increased traffic associated with the proposed action would affect community cohesion if it were to block or obstruct access to important community resources.

As discussed for existing conditions, the rail line is one of the primary dividing elements in the study area, especially in Centralia, Fords Prairie, Ground Mound, Rochester, Elma, and Aberdeen, Fords Prairie. Existing rail traffic already causes vehicle delay and temporary access limitations in these communities.

Increased unit train traffic related to the proposed action would result in increased occupancy of PS&P rail line grade crossings (Chapter 3, Section 3.15, *Rail Traffic*). As noted in Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, these areas would result in increases in vehicle delay along the rail line. However, for the majority of the line (between Centralia and Aberdeen), although there would be an increase in the total number of minutes each grade crossing would be blocked for an average 24-hour period, the actual traffic impacts (level of service) would not notably worsen. This is primarily because existing (and future) vehicle traffic is projected to remain relatively low along the PS&P rail line. In other words, for an average driver, the chances of encountering and having to wait for a passing train would not notably change compared to the no-action alternative. However, as noted in Section 3.16, *Vehicle Traffic and Safety*, there are locations in Aberdeen and Hoquiam

[10] A trip represents one-way travel; in other words, an inbound trip and an outbound trip are counted as two trips.

where vehicle delay and access would notably worsen. As described in Section 3.15, *Rail Traffic*, this has to do with switching activity (i.e., delivering and removing trains from the project sites). Vehicles at grade crossings in Aberdeen would experience the most substantial increase in average vehicle delay with the addition of the proposed action trains (Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, Table 3.16-5). These grade crossings are located in two general areas.

- **Port of Grays Harbor area:** Average vehicle delay would worsen in the Port area due to switching operations at the Poynor Yard to break down unit trains and the delivery of the rail cars across Industrial Road to the project site, as described in Chapter 3, Section 3.15, *Rail Traffic*. The Industrial Road crossing at the project site would degrade from LOS B to LOS F (Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, Figure 3.16-3). The Port Industrial Road and West 1st Street crossings would degrade from LOS A to LOS D due to switching operations west of Port Industrial Road.
- **Olympic Gateway Plaza area:** Average vehicle delay would worsen in the Olympic Gateway Plaza area with the proposed action. Delays at grade crossings blocked by activities at the Poynor Yard under existing conditions would lengthen with the addition of proposed action trains (Chapter 3, Section 3.15, *Rail Traffic*). The level of service would degrade from LOS C or D to LOS E or F at the East Heron Street, Newell Street, South Chehalis Street, and Tyler Street crossings at the Olympic Gateway Plaza (Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, Figure 3.16-4). The grade crossings further east in the Olympic Gateway Plaza would degrade from LOS B to level of service D.

Additionally, as further noted in Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, access into the Olympic Gateway Plaza and the industrial area near the project sites would also substantially worsen. Although the proposed mitigation in Section 3.16 could alleviate some of the impacts, the adverse impacts would likely remain unavoidable and significant.

Vessel

As described in Chapter 3, Section 3.17, *Vessel Traffic*, operation of the proposed action at maximum throughput would result in an average of approximately one tank vessel trip[11] per day (a maximum of 400 per year[12]) along the navigation channel compared to the 436 large commercial vessel trips under the no-action alternative.

Although the navigation channel is an existing transportation route, the increased traffic associated with the proposed action would affect community cohesion, if it were to block or obstruct access to important community resources. Because vessel operations are far from the shore, impacts on community cohesion related to increased vessel traffic would be limited to in-water uses. As described in Chapter 3, Section 3.10, *Recreation*, recreational fishing and pleasure boating occurs throughout the harbor and these vessels would be required to move out of the way of the tank vessels transiting the harbor via the navigation channel. Recreational fishing and pleasure boating occurs throughout the harbor and the small vessel could easily navigate away from tank vessels in transit. As described in Chapter 3, Section 3.12, *Tribal Resources*, and Section 3.17, *Vessel Traffic*, increased vessel traffic would disrupt commercial fishing and tribal fishing that occurs along the navigation channel. Transiting vessels related to the proposed action would limit the timing, duration, and physical area that could be fished. Proposed mitigation providing advance notice of

[11] A trip represents one-way travel.

[12] Proposed vessel trips are total for the facility so are not in addition to trips attributable to the applicant under the no-action alternative (approximately 14 per year).

incoming vessels related to the proposed action could help reduce potential conflicts, but would still likely result in some disturbances.

Community Welfare

Operation of the proposed action would affect community welfare if it were to substantially degrade air quality, increase noise, reduce access to parks and recreational uses, or reduce property values.

Onsite

As described in Chapter 3, Section 3.2, *Air*, onsite operation of the proposed action would result in emissions of criteria air pollutants from stationary sources (e.g., emissions from storage tank cleaning, combustion of vapors from vessel loading) and from mobile sources (e.g., emissions from rail locomotives and vessel engines that would occur onsite), with the most potentially problematic air pollutant being nitrogen oxides (NO_X). Onsite operation of the proposed action would also result in emissions of toxic air pollutants, which would all be under regulated standards. Onsite operations of the proposed action are not expected to result in increased air emissions that would adversely affect the surrounding community.

As discussed in Chapter 3, Section 3.7, *Noise and Vibration*, noise and vibration levels related to onsite operations are anticipated to be similar to levels generated by other industrial sources and would not result in substantial increases that would be noticeable to surrounding recreational and residential uses. The impacts of air and noise emissions related to the movement of rail cars onto and off the project site are described below under *Rail*.

As described in Chapter 3, Section 3.10, *Recreation*, onsite operations would occur entirely within the boundaries of the project site and would not block access to offsite recreational facilities. Increased tank vessel calls under the proposed action would increase the number of days that a vessel would occupy the Terminal 1 berth. Impacts on recreational fishing and pleasure boats would be low because boaters could access other boating and fishing areas throughout the harbor.

As discussed in Chapter 4, *Environmental Health and Safety*, although the risks associated with incidents occurring on site would remain relatively low, the environmental outcome of larger incidents (e.g., oil spills associated with storage tank failures) would be substantially different compared to the no-action alternative. This is because of the potential for additional harmful substances (e.g., crude oil) to enter the environment. As indicated in Section 4.5.2.1, *Oil Spills*, depending on the circumstances of the event, the damage could vary widely; however, if crude oil entered the environment, environmental degradation could occur that could adversely affect humans and the natural environment.

As discussed in Chapter 4, numerous measures and protocols are in place to prevent and minimize the extent of a spill. These measures are aimed at minimizing the frequency of a potential spill and the extent of the spill and reduce the potential for a spill, fire, or explosion and adverse impacts on the environment and human health. However, no mitigation measures would eliminate the possibility of a large spill or explosion, nor would they eliminate the adverse consequences of a large spill or explosion. Additionally, the perception of increased risks and concerns over the potential for environmental damage may also cause some individuals concern they would otherwise not have related to these risks. The impacts on property values are discussed in Section 7.3.3.2, *Fiscal Revenues to the City of Hoquiam*.

Rail

As described in Chapter 3, Section 3.2, *Air*, onsite operations related to the proposed action are not anticipated to result in any exceedance of applicable air quality standards that could affect human health. Although there would be some increases in diesel particulate matter emissions related to the proposed action, primarily in the areas where switching activities would be occurring (around the project site and in Poynor Yard), the extent of the risk would remain primarily around the industrially developed areas and would be adequately addressed through incorporation of mitigation measures. See Section 3.2, *Air*, for more information about the analysis of air toxics along the PS&P rail line.

As described in Chapter 3, Section 3.7, *Noise and Vibration*, increased frequency of rail traffic and the associated routine operational activities would increase noise primarily related to horn noise. Increased noise exposure would occur around grade crossings relatively evenly distributed along the PS&P rail line, with the most affected receptors in areas where residential development occurred closest to the rail line in the Elma–Satsop area (195), followed by Centralia (69), Montesano (28), the area west of Montesano and east of Aberdeen (26), and in Aberdeen (27). A total of 398 receptors would be affected.

However, as noted previously, it is not possible to predict when trains would be traveling to and from the project site or what time of day a train may pass by and the potential impacts. All trains would continue to travel at the same speeds and would continue to sound horns consistent with existing operational practices. As noted above, the number of events per day would increase by approximately two trips per day on average, meaning on average, sensitive receptors would experience train horns sounding up to two additional times per day on average.

As described above under *Community Cohesion* (and detailed in Chapter 3, Section 3.16, *Vehicle Traffic and Safety*) increased rail traffic along the PS&P rail line related to the proposed action would result in increased vehicle delays at grade crossings with the most substantial increase in average vehicle delay in Aberdeen and closest to the project site. Implementation of the mitigation in Section 3.16 would offset some of the impacts; however, the potential for substantial delay in these areas would likely remain.

Increased rail traffic related to the proposed action could also affect local communities as the result of the increased risk of train incidents. The specific increases in risks and the potential environmental consequences are discussed in Chapter 4, *Environmental Health and Safety*. As indicated in Section 4.5.2.1, *Oil Spills*, and Section 4.5.2.2, *Fires or Explosions*, depending on the location of the incident and the specifics of the outcome (e.g., material spilled, volume, potential for ignition), such an event could result in extensive environmental damage.

As discussed in Chapter 4, numerous measures and protocols are in place to prevent and minimize the extent of a spill. These measures are aimed at minimizing the frequency of a potential spill and the extent of the spill and would reduce the potential for a spill or explosion and adverse impacts on the environment and human health. However, no mitigation measures would eliminate the possibility of a large spill, fire, or explosion, nor would they eliminate the adverse consequences of a large spill, fire, or explosion. These impacts, should they occur, could shape the perception that the communities in the study area are unsafe, unhealthy, or undesirable. These perceptions could affect community welfare whether or not there is a measurable impact on community resources or a substantial increase in risks related to the proposed action.

Vessel

As described in Chapter 3, Section 3.2, *Air*, emissions from vessel traffic related to the proposed action would not adversely affect public health because the emissions from transiting vessels do not affect the shoreline.

As described in Chapter 3, Section 3.7, *Noise and Vibration,* increased noise from vessel traffic related the proposed action is anticipated to be within levels similar to existing conditions and would not result in substantial increases that would be noticeable to surrounding recreational and residential uses.

As described in Chapter 3, Section 3.10, *Recreation*, Chapter 3, Section 3.12, *Tribal Resources*, and Section 3.17, *Vessel Traffic*, increased tank vessel traffic along the navigation channel under the proposed action would result in some conflict with commercial fishing, tribal fishing and recreational vessels accessing the harbor via the 28th Street Boat Ramp and Viewing Tower.

Increased vessel traffic related to the proposed action could also affect local communities as the result of increased risks of incidents (e.g., vessel collision) and associated spills compared to the no-action alternative. The specific increases in risks and the potential environmental consequences are discussed in Chapter 4, *Environmental Health and Safety*. As indicated in Chapter 3, Section 4.5.2.1, *Oil Spills*, depending on the location of the incident and the specifics of the outcome (e.g., material spilled, volume, potential for ignition), such an event could result in extensive environmental damage.

As discussed in Chapter 4, numerous measures and protocols are in place to prevent and minimize the extent of a spill. These measures aimed at minimizing the frequency of a potential spill and the extent of the spill would help to reduce the potential for a spill or explosion and adverse impacts on the environment and human health. However, no mitigation measures would eliminate the possibility of a large spill, fire, or explosion, nor would they eliminate the adverse consequences of a large spill, fire, or explosion. These impacts, should they occur, could shape the perception that the communities in the study area are unsafe, unhealthy, or undesirable. These perceptions could affect community welfare whether or not there is a measurable impact on community resources or a substantial increase in risks related to the proposed action.

Population Growth

Operation of the proposed action would have a limited potential to affect population demographics primarily associated with the creation of an estimated 103 direct jobs in Grays Harbor County. Although some of these jobs could be filled by new residents moving into the area, it is more likely they would be filled by current residents or by workers living outside the area (as would likely be the case with rail and vessel operators). Some additional indirect and induced jobs would also be created (estimated 207 additional jobs) throughout the county; however, the population is unlikely to increase noticeably to meet this need. Therefore, impacts of operation of the proposed action related to population growth—permanent relocation of workers from outside the study area, displacement of local residents, and the requirement for additional housing—would be low.

Minority and Low-Income Populations

Onsite

As shown in Table 7-10, minority and low-income populations in the census block groups near the project site are much higher (7.8 and 12.6%, respectively) than Grays Harbor County levels. However, as noted above, potential impacts from routine onsite operations are not anticipated to result in significant environmental impacts and would therefore, not be expected to significantly adversely affect minority and low-income populations around the project site.

As discussed in Chapter 4, *Environmental Health and Safety*, although the risks associated with incidents occurring onsite would remain relatively low, the environmental outcome of larger incidents (e.g., hazardous materials releases associated with storage tank failures) could result in significant environmental impacts should such an event occur. This is because of the potential for additional bulk liquids (e.g., crude oil) to enter the environment. For a discussion of the risks related to the risks of incidents and the associated environmental outcomes, see Chapter 4, *Environmental Health and Safety*.

As noted in Section 4.5.2.1, *Oil Spills*, depending on the circumstances of the event, the damage could vary widely; however, if crude oil entered the environment, environmental degradation could occur that could adversely affect humans and the natural environment. Additionally, the perception of increased risks and concerns over the potential for environmental damage may also cause some individuals concern they would otherwise not have related to these risks. Any large releases with the potential to enter the harbor from the project site could also disproportionately affect minority and low-income populations in these areas.

Although it is not possible to determine the specific outcome of any one event, any event that might adversely affect fisheries or natural resources within the harbor would cause impacts on tribal resources; namely, the Quinault Indian Nation's Usual & Accustomed Fishing Rights and the Chehalis Tribe recreational shellfish area. For additional details about impacts on tribal resources, see Section 3.12, *Tribal Resources.*

Rail

As discussed in Section 7.2.3.4, *Minority and Low-Income Populations,* 31 of the 43 census block groups along the PS&P rail line are considered minority and/or low-income populations for the purposes of this analysis. These populations occur primarily along the entire rail corridor with the exception of a small area near Rochester and between Satsop and Montesano.

As discussed in Chapter 3, Section 3.2, *Air*, increased rail traffic related to the proposed action would result in increases in air emissions. However, as discussed in that section, emissions are not anticipated to be high enough to materially affect the air quality in the air basin or Grays Harbor County. Additionally, the potential for increased rail traffic to result in localized exposure to potentially hazardous air pollutants would be low and would therefore, not result in disproportionate impacts.

As discussed in Chapter 3, Section 3.7, *Noise and Vibration,* there would be increases in noise along the rail line, primarily related to increase horn noise at grade crossings. These impacts are distributed relatively evenly along the line but would affect a greater number of individuals where the residential development occurs closest to the line. As shown in Figure 7-1, the census block groups are large and extend relatively far from the rail line. The impacts of increased horn noise are

anticipated to affect only the first or second row of buildings from the rail line. While it is not possible to determine the status of individual residents, it is possible that minority and low-income populations closest to the rail line could be disproportionately affected by increases in noise depending on the proximity of noise-sensitive receptors (residents) to the line.

As discussed in Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, and noted above, increased rail traffic related to the proposed action could result in significant increases in delay at certain intersections, primarily around the project site and in East Aberdeen. These impacts could disproportionately affect minority and low-income populations in communities immediately surrounding the affected areas.

As discussed in Chapter 4, *Environmental Health and Safety*, the risks associated with incidents occurring along the PS&P rail line would be greater compared to the no-action alternative (although still low) and the environmental outcome of larger incidents (e.g., hazardous materials releases associated with train derailments) would be substantially different compared to the no-action alternative. In the event of a larger release of hazardous materials, significant environmental impacts could occur. This is because of the potential for additional bulk liquids (e.g., crude oil) to enter the environment. For a discussion of the risks related to the risks of incidents and the associated environmental outcomes, see Chapter 4, *Environmental Health and Safety*. Depending on the specific location of the event, there is the potential for minority and low-income populations to be disproportionately affected.

Vessel

As discussed in Section 7.2.3.4, *Minority and Low-Income Populations,* 15 of the 22 census block groups along the Grays Harbor shoreline are considered minority and/or low-income populations for the purposes of this analysis. These populations occur primarily in Ocean Shores, Hoquiam, Aberdeen, Cosmopolis, and along the entire southern shore of the harbor.

In general, the proportions of minority and low-income populations in the study area communities are higher than at the state and county level, with the most meaningful differences occurring closer to the project site and around the harbor. While any impacts would disproportionately affect minority and low-income populations, as stated previously, vessel-related impacts are anticipated to be relatively low with two exceptions: the potential for conflicts with tribal access to usual and accustomed fishing areas and the potential for environmental health and safety impacts. Impacts on tribal resources are discussed in Chapter 3, Section 3.12, *Tribal Resources*. As noted in that section, the potential adverse impacts on tribal resources related to access to usual and accustomed fishing areas, would be unavoidable and significant.

As discussed in Chapter 4, *Environmental Health and Safety*, the risks associated with incidents occurring along the navigation channel through the mouth of the harbor would be greater compared to the no-action alternative (although still low) and the environmental outcome of larger incidents (e.g., hazardous materials releases associated with vessel collisions) would be substantially different compared to the no-action alternative. In the event of a larger incidents or release of hazardous materials, significant environmental impacts could occur. This is because of the potential for additional bulk liquids (e.g., crude oil) to enter the environment. For a discussion of the risks related to the risks of incidents and the associated environmental outcomes, see Chapter 4, *Environmental Health and Safety*. Depending on the specific location of the event, there is the potential for low-income populations to be disproportionately affected.

7.2.5 What mitigation measures would reduce impacts on social policy?

This section describes the applicant mitigation that would reduce impacts on social policy from construction and routine operation of the proposed action.

The greatest potential for significant social impacts is related to increased rail traffic from routine operations that could result in increased noise and vehicle delay and safety concerns along the PS&P rail line. Mitigation to address impacts related to noise and vehicle traffic and safety that would also address potential impacts on the community in general are presented in Chapter 3, Sections 3.7, *Noise and Vibration*, and 3.16, *Vehicle Traffic and Safety*.

Additionally, increased risks could adversely affect environmental health and safety in the study area. The potential for increased risks during onsite, rail, and vessel operations (e.g., storage tank rupture, train derailment, or vessel collision) and the related environmental consequences (e.g., release of hazardous materials) are addressed in Chapter 4, *Environmental Health and Safety*. As noted in Chapter 4, even with the implementation of mitigation measures, some low risks would remain. Because of the extent of the damage that would result in the event of an incident, these risks would remain unavoidable and significant.

7.2.5.1 Applicant Mitigation

The applicant will implement the following mitigation.

- The applicant will appoint a community liaison to consult with affected communities, businesses, and agencies; develop cooperative solutions to address local concerns; be available for public meetings; and conduct periodic public outreach. The applicant will provide the name, telephone number, and email address of the community liaison to mayors and other local officials in each community through which the PS&P rail line passes.
- The applicant will appoint a tribal liaison to assist in addressing issues of concerns to federally recognized tribes; develop cooperative solutions to tribal concerns; be available for tribal meetings; and conduct periodic outreach. The applicant will provide the name, telephone number, and email address of the tribal liaison to officials of each tribe that wish to be notified.
- The applicant will submit quarterly reports to the City of Hoquiam on the progress of, implementation of, and compliance with all mitigation measures. The reporting period for these reports will begin the first quarter after permit issuance and continue quarterly through the first year of project operations after which the applicant will submit a report annually through the first 5 years of operation.

7.3 Cost-Benefit Analysis

This section describes the cost-benefit analysis required by the City of Hoquiam (HMC 11.10.16). Because the cost-benefit analysis informs the City's decision regarding issuance of the land use permits, the scope of the analysis is limited to potential costs and benefits to the residents of

Hoquiam. This section describes costs and benefits related to employment, income, and fiscal revenues as a result of the construction and routine operation[13] of the proposed action.

7.3.1 What is the study area for the cost-benefit analysis?

The study area for the cost-benefit analysis considers the costs and benefits that would affect the residents of Hoquiam and the city at large. In addition to resources in Hoquiam, this study area includes resources in Aberdeen but only to the extent that job creation in Aberdeen would affect residents of Hoquiam.

7.3.2 How was the cost-benefit analysis conducted?

This section describes the sources of information and methods used to conduct the cost-benefit analysis.

7.3.2.1 Information

Information used in this analysis came from the sources described in Chapter 3, *Affected Environment, Impacts, and Mitigation*, and through conversations with staff at the City of Hoquiam.

7.3.2.2 Impact Analysis

Cost-benefit analysis is a commonly used tool for evaluating proposed policies and actions. Cost-benefit analysis is conducted by estimating the net benefits of a proposed action or the benefits of a proposed action minus the costs of the action. In a cost-benefit analysis, a proposed action is usually evaluated over a period long enough for the main costs and benefits of the action to be realized. Costs and benefits that accrue in future years are then expressed in present value terms through the application of a discount rate. When conducting a cost-benefit analysis, the goal is to express as many impacts in monetary terms as possible. It is often not possible, however, to ascribe a monetary value to all relevant impacts because some impacts are difficult to quantify, and other impacts, even if they can be quantified, are difficult to express in monetary terms. When impacts in a cost-benefit analysis cannot be expressed in monetary terms for either of these reasons, they are discussed and evaluated on a qualitative basis.

This cost-benefit analysis is based on the analysis of impacts from the proposed action on the resources discussed in Chapter 3, *Affected Environment, Impacts, and Mitigation*. Impacts of the proposed action related to increased safety risks (e.g., storage tank failure, train derailments, vessel collisions) analyzed in Chapter 4, *Environmental Health and Safety,* are also considered. However, because there are many factors that contribute to the specific circumstances of an environmental outcome (e.g., hazardous materials release) related to an incidents, it is difficult to predict the specific outcomes that may occur. Therefore, the cost-benefit analysis considers costs that may accrue to the City of Hoquiam related to preparing for the potential consequences rather than costs that may be incurred related to cleanup activities and the related degradation. Costs and benefits from socioeconomic impacts analyzed in previous sections of this chapter are also considered.

[13] Chapter 4, *Environmental Health and Safety*, addresses the potential impacts from increased risk of incidents (e.g., storage tank failure, train derailments, vessel collisions) and related consequences (e.g., release of crude oil or other proposed bulk liquids).

Short-term impacts during construction and long-term impacts during routine operations are both considered.

Impacts leading to an increase in revenues to the City of Hoquiam are assumed to benefit the residents of Hoquiam because increased revenues would lead to increased local public services, reduced future growth in local taxes paid by current residents, or both. Impacts that correspond to an increase in the demand for local public services are assumed to be a cost to the residents of Hoquiam because they would result in a need for future increases in local tax collections or would compete with existing local demand. Costs and benefits to the residents of Hoquiam would also result to the extent that the proposed action would affect employment and income, leisure, and nonmarket values, such as those associated with environmental resources (e.g., water quality, clean air).

Impacts are discussed quantitatively, to the extent that quantitative indicators are provided in the analyses in Chapter 3, *Affected Environment, Impacts*, *and Mitigation*. When quantitative impact estimates are available, the monetary impacts on the residents of Hoquiam are discussed, to the extent possible. All monetized impacts are presented in 2013 dollars. Because it is not possible to monetize all impacts, it is not possible to reach one estimate of net present value of the proposed action for the residents of Hoquiam. No attempt to generate a future stream of costs and benefits is made, and no discount to the monetized value of future impacts is applied. Rather, the costs and benefits are described to summarize information to be used in assessing the financial outcomes of implementing the proposed action. The monetized impacts are presented separately for the construction period (for this analysis, assumed to occur in 1 year) and for a representative 1-year period during operations.

As discussed in Chapter 3, *Affected Environment, Impacts*, *and Mitigation*, although construction and routine operations could affect the resources addressed in that chapter, in general, these impacts would be low either before or after implementation of the recommended mitigation. Because the proposed action would have low impacts on most resources, there would be no measurable benefits or costs to the residents of Hoquiam from those impacts and they are not discussed further in this analysis.

The notable exceptions include potential impacts related to noise, tribal resources, vehicle traffic and safety, and environmental health and safety. With respect to noise, as discussed in Section 3.7, *Noise and Vibration*, substantial increases in noise levels would occur nearby the PS&P rail line. Because the portion of the PS&P rail line that would be used related to the proposed action is located entirely in Aberdeen (and at least 450 feet from residents of Hoquiam), there would be no significant impacts on residents of Hoquiam.

Additionally, although there would also be impacts on tribal resources; namely, the Quinault Indian Nation's Usual & Accustomed Fishing Rights, it is not clear how those impacts might directly translate to broader economic losses relative to the residents of Hoquiam or to the city at large. However, as noted in Section 3.12, *Tribal Resources*, there is the potential for economic implications to members of the Quinault Indian Nation, depending on the extent of the disruption as a result of the proposed action.

As discussed in Chapter 3, Section 3.16, *Vehicle Traffic and Safety*), in Chapter 4, *Environmental Health and Safety*, and in Section 7.1, *Economics*, there is the potential for significant impacts that could affect the City of Hoquiam related to these resources and they are therefore, addressed further in the cost-benefit analysis. Although there could also be substantial increases in noise (Section 3.7,

Noise and Vibration) and disturbance to tribal fishing (Section 3.12, *Tribal Resources*), impacts on these resources would not likely affect Hoquiam residents and are not considered further in this analysis. The following sections focus on assessing the costs and benefits related to the potential impacts of the proposed action. As noted in Section 7.1, *Economics*, benefits are related to increased employment and income and fiscal revenues that could accrue to the City of Hoquiam as the result of the proposed action. The discussion of costs focuses on those that would affect the City of Hoquiam as the result of increased vehicle traffic and safety concerns, environmental health and safety concerns, and impacts on property values related to the real and perceived impacts that would occur within or affect the City of Hoquiam.

7.3.3 What are the benefits of the proposed action?

This section describes the beneficial impacts of the proposed action that could occur in the study area.

7.3.3.1 Employment and Income

As discussed in Section 7.1.4.2, *Proposed Action*, construction and operation of the proposed action would result in increased employment and income associated with direct spending related to labor salaries and benefits and material purchases. Additionally, these activities would result in indirect and induced employment and income impacts. As discussed below, it is possible to estimate the proportion of employment and income likely to benefit the City of Hoquiam.

Construction

As discussed in Section 7.1, *Economics*, and presented in Appendix O, *Census Block Group Data*. ECONorthwest (2014) estimated that the construction of Phase 1 of the proposed action would support 73 direct jobs and an additional 197 indirect and induced jobs in Washington State. Each job would consist of a full-time or part-time position during a 1-year period. The 73 direct jobs would provide construction labor at the project site. The remaining 197 indirect jobs could occur anywhere in Washington. Construction of Phase 2 would add 33 direct jobs and 86 indirect and induced jobs in Washington.

U.S. Census Bureau estimates of commuting patterns indicate that approximately 23% of workers employed in Hoquiam reside in the city, and that 27% of workers employed in Aberdeen reside in Hoquiam (U.S. Census Bureau 2011). If the workers employed at the construction site show similar patterns of residence as to those of the general population, and if each 1-year job is filled by one worker,[14] between 17 and 20 direct construction workers (between 23 and 27% of total) would reside in the City of Hoquiam during Phase 1. An additional 8 to 9 construction workers (between 23 and 27% of total) would reside in Hoquiam in Phase 2. A share of the indirect and induced employment could also occur in Hoquiam.

ECONorthwest (2014) estimated that each onsite construction job would pay approximately $125,000 a year in total compensation (wages and benefits). If 25 to 29 of the 106 onsite

[14] ECONorthwest (2014) estimates the number of jobs associated with the proposed action. These jobs are defined as 1-year part-time or full-time employment. Because two workers employed for 6 months each would correspond to one job and one worker employed for 2 years would correspond to two jobs, jobs and employed persons are not the same. For analytical purposes, this section assumes each job corresponds to one worker employed over a 1-year period.

construction jobs are filled by construction workers that reside in Hoquiam (as assumed above), construction would generate an estimated $3.1 million to $3.6 million in labor income for construction workers residing in Hoquiam during both Phase 1 and Phase 2 of construction.

Additional labor income would be generated in Hoquiam, associated with indirect and induced jobs. ECONorthwest estimates 283 indirect and induced jobs would be generated during construction (both Phases 1 and 2) in Washington State. It is not possible to infer from the ECONorthwest study and from readily available data how many of these jobs would be likely to occur in Hoquiam. These jobs would average $53,500 in annual labor income per job (ECONorthwest 2014).

Operations

During operations, ECONorthwest (2014) estimated that 14 direct jobs would be supported at the terminal if only Phase 1 infrastructure were operational, and an additional 6 direct jobs would be supported at the terminal if both Phase 1 and Phase 2 infrastructure were operational. An additional 27 indirect and induced jobs (20 in Phase 1 and 7 in Phase 2) would be generated in Grays Harbor County, associated with the creation of the direct jobs at the project site. As noted in Section 7.1, *Economics*, additional direct, indirect, and induced employment in Grays Harbor County would be generated associated with vessel and rail transportation; however, it is anticipated that most of these jobs would occur outside the local communities. Although some rail and vessel jobs may be filled by residents of Hoquiam or Aberdeen, for the purposes of providing a conservative estimate, job creation associated with increased rail and vessel operations are not included.

Assuming all direct jobs in Grays Harbor County would be located in Hoquiam and Aberdeen (excluding vessel and rail transportation direct jobs), it is possible to estimate the number of operations jobs filled by workers who reside in Hoquiam. Assuming each job is filled by one worker, and using the same U.S. Census Bureau commuting pattern estimates used to analyze construction jobs, between 23 and 27% of direct operations workers would reside in Hoquiam. This would correspond to 4 to 5 workers (from a total of 20). A share of the indirect and induced employment could also occur in Hoquiam.

ECONorthwest (2014) estimated that each direct terminal job would pay approximately $65,000 a year in total compensation (wages and benefits). Under these assumption, total labor income in Hoquiam, supported by operational jobs directly linked to the proposed action, would correspond to between $ 260,000 (4 multiplied by $65,000) and $325,000 (5 multiplied by $65,000), assuming a full build-out (after Phase 1 and Phase 2 construction).

Additional labor income would be generated in Hoquiam, associated with indirect and induced jobs. ECONorthwest (2014) estimated that 105 indirect and induced jobs would be generated during operations (at full build-out) in Grays Harbor County. It is not possible to infer from the ECONorthwest study and from readily available data how many of these jobs would be likely to occur in the City of Hoquiam. These jobs would average $38,600 in annual labor income per job (ECONorthwest 2014).

Operations jobs would be permanent. Because permanent jobs generate income year after year, they are more likely to induce additional economic activity attracting businesses and local investment than temporary construction jobs.

7.3.3.2 Fiscal Revenues to the City of Hoquiam

As discussed in Section 7.1.4.2, *Proposed Action*, in addition to generating increased employment and income, construction and routine operations of the proposed action would also result in increased fiscal revenues. As discussed below, it is possible to estimate the proportion of revenues that would likely accrue to the City of Hoquiam. Increased revenues would be generated by the property tax, sales tax, business and occupation tax, utility taxes, and building permits.

Property Tax and Leasehold Excise Tax

The Port is a public port and a taxing district. The use of public land and publicly owned property pays a leasehold tax to the Port in lieu of real estate property taxes. A portion of the leasehold tax is transferred to the city where the property is located. The tax rate for the city's portion of the leasehold tax is up to 4% of the rent paid for the property, with the remaining of the 12.84 % tax rate going to the county and state (Washington State Department of Revenue 2010). There is currently no information on changes in property rents paid by the applicant to the Port due to the proposed action. To the extent that property rents increase, the City of Hoquiam portion of the leasehold excise tax would increase as well.

Owners of private improvements at the Port pay regular property taxes to the city where their property is located, including taxing districts within the city such as school districts (Washington State Department of Revenue 2010). The property tax levy rate for the City of Hoquiam in 2014 was approximately $10.98 per $1,000 of assessed value, including the Hoquiam school district and an emergency medical service levy (Washington State Department of Revenue 2014a).

ECONorthwest (2014) estimated property taxes to be paid by Westway Terminal Company LLC and the applicant based on information provided directly by both. Jointly, the two projects would pay $223,222 in property taxes during construction and $1,869,393 during each year of operations, assuming a full build-out (Phase 1 and Phase 2). ECONorthwest does not report the portion attributable to the applicant's proposed action and the portion attributable to the Westway Terminal Company LLC's proposed action. However, it is reasonable to assume that the assessed value of each proposed action is proportional to construction costs. In this case, approximately 51.9% of the total assessed value of these two proposed actions corresponds to the applicant's proposed action.[15] The tax rate paid by Westway Terminal Company LLC and the applicant would not necessarily be the same because the applicant's facilities would be mostly located in Hoquiam, while the Westway Terminal Company LLC facilities would be partially located in Aberdeen.[16] Assuming 100% of the applicant's assessed property value is taxed by the City of Hoquiam (based on the location of the project site relative to the city borders), property tax collections by the City of Hoquiam can be estimated to be approximately $120,428 during construction and approximately $1,008,538 during each year of operation.

Sales and Use Tax

As of January 2015, the Hoquiam local sales/use tax rate is 6.5% (Washington State Department of Revenue 2014b). In other words, for each dollar spent in Hoquiam, the city collects 6.5% in local

[15] ECONorthwest (2014) estimated total construction costs for Imperial Terminal Services to be $66.1 million at full build-out and for Westway Terminal Company LLC to be $61.3.

[16] In 2014, the property tax levied by the City of Aberdeen was $9.25 per $1,000 compared to $10.98 per $1,000 for the City of Hoquiam (Washington State Department of Revenue 2014a).

sales/use tax. During construction of the proposed action, construction service providers would pay City of Hoquiam sales taxes to the extent that they are established within the city boundaries. This would also be the case of subcontracted companies, providers of inputs, and establishments where workers spend their income. Similarly, sales by establishments located in Hoquiam during operations would also pay City of Hoquiam sales taxes. There is no information on the extent to which service and input providers, during construction or operations, would be located in Hoquiam, or the extent to which earnings associated with construction and operations of the proposed action would be spent in Hoquiam. Therefore, it is not possible to estimate sales and use taxes collected by the City of Hoquiam from construction and operation of the proposed action.

Business and Occupation Tax

Washington State does not have an income tax and the state taxes gross receipts of businesses in specific occupations, known as the business and occupation tax. The City of Hoquiam imposes a local business and occupation tax, in addition to that imposed by the State of Washington. As of January 2014, Hoquiam's business and occupation tax rate was 0.2% of gross receipts for all major categories of business (manufacturing, retail, wholesale and services) (Association of Washington Cities 2014). During construction of the proposed action, construction service providers would pay City of Hoquiam business and occupation taxes to the extent that they are established within the city boundaries. This would also be the case of subcontracted companies, providers of inputs, and establishments where workers spend their income. Similarly, gross receipts by establishments located in Hoquiam during operations would also pay City of Hoquiam business and occupation taxes. As in the case of sales and use tax collections, there is not enough information to estimate the business and occupation tax collections by the City of Hoquiam that would be associated with the proposed action. This would require estimating the extent to which construction and operations service and input providers would be located in Hoquiam, as well as the location of establishments where proposed action- related earnings would be spent.

Utility and Other Taxes, Licenses, and Permits

The City of Hoquiam taxes gross operating revenues derived from business in the city of various types of utilities, including gas, electricity, cable TV, telephone, garbage collection and water, sewer and stormwater collection. Tax rates range between 6 and 8% (HMC 4.88). During both construction and operations of the proposed action, increased business revenues, and labor income in Hoquiam associated with employment at the terminal and with train and vessel operations, and input and service providers to construction and operations, would result in increased utility revenues and, consequently, increases utility tax collections for the City of Hoquiam. Because the increase in demand for utilities associated with the proposed action was determined to be minor (Chapter 3.13, *Public Services and Utilities*), the increase in utility tax collections to the City of Hoquiam would be expected to be minor as well.

Other minor City of Hoquiam revenues derived from the proposed action would include revenues from licenses and permits, particularly building permits.

7.3.4 What are the costs of the proposed action?

Potential costs relevant to the City of Hoquiam would be the result of potentially significant impacts that would directly affect residents or the city at large. This section discusses the costs that could occur as the result of increased vehicle traffic and safety concerns, and of real and perceived risks

associated with onsite operations and rail and vessel transport due to environmental health and safety impacts. Additionally, this section addresses the potential for these impacts to affect property values in Hoquiam.

7.3.4.1 Potential Costs Related to Increased Vehicle Traffic and Safety

As discussed in Chapter 3, Section 3.15, *Rail Traffic*, and 3.16, *Vehicle Traffic and Safety*, operation of the proposed action would result in increased rail traffic along the PS&P rail line that would increase vehicle delays at certain grade crossings and surrounding intersections during operations. Additionally, increased train traffic would result in increased risks of accidents at grade crossings along the entire PS&P rail line. The average number of train trips along the PS&P rail line is expected to increase from approximately three train trips per day by an additional two trips per day.

Although none of the directly affected intersections is located in Hoquiam, Hoquiam residents commuting to Aberdeen and other areas east of the project site would have increased potential to be delayed at a grade crossing by a train or to be affected by increased congestion at surrounding intersections as motorists attempt to bypass blocked grade crossings. As a result, depending on the timing of such an event and on commuting routes, residents may see their commuting times increase.

It is not possible to estimate how much commuting time would increase for these residents because it is not possible to know what specific roads would be taken or what share Hoquiam residents would represent of the vehicles on roads affected by delays during commuting times. Increases in commuting times would have a cost to the residents of Hoquiam. This cost would correspond to the estimated opportunity cost of their time; i.e., the value of the time they would spend in other activities (work or leisure) were they not delayed in traffic. The U.S. Department of Transportation developed a measure of this value that it uses in regulatory analysis (Belenky 2011). The opportunity cost of one hour in surface traffic for all-purpose traffic (business and personal) is estimated to be between $9.66 and $16.18 per person for local traffic and between $16.51 and $24.76 per person for intercity traffic, in 2013 dollars.[17]

As discussed in Chapter 3, Section 3.16, *Vehicle Traffic and Safety*, increased rail and vehicle traffic would contribute to an increase in the expected number of vehicle accidents at grade crossings. Although none of these grade crossings is located in Hoquiam, residents commuting to Aberdeen and other nearby areas could face increased risk of accidents if commuting routes include affected grade crossings. It is not possible to estimate this increase in risk because there is not enough information on commuting routes for residents of Hoquiam. Accidents have an economic cost that includes the cost of damage to property, lost productivity associated with injury and death, the cost of medical and emergency services, travel delays, added fuel consumption, and pollution impacts caused by congestion, among others.

A recent study from the National Highway Traffic Safety Administration (2014) estimated the total economic costs of traffic accidents (not including the value of lives lost or the loss of quality of life due to nonfatal injuries) to be from $3,037 per person to $1.5 million per person in 2013 dollars, depending on the severity of injuries or on fatalities.[18] Individuals involved in these crashes pay for

[17] Values reported in 2009 dollars were adjusted for inflation using the U.S. Bureau of Labor Statistics Consumer Price Index (2014).
[18] Values reported in 2010 dollars were adjusted for inflation using the U.S. Bureau of Labor Statistics Consumer Price Index (2014).

approximately 25% of these costs, the remaining being paid by insurance companies, public revenues, and other third parties such as motorists delayed in traffic and health care providers.

7.3.4.2 Potential Costs Related to Environmental Health and Safety Concerns

As discussed in Chapter 4, *Environmental Health and Safety*, operation of the proposed action could increase safety risks (e.g., storage tank failure, train derailments, and vessel collisions) that could result in harm to both humans and the surrounding environment depending on the specific circumstances of such an event and the related environmental consequences (e.g., hazardous materials release).

In terms of potential costs to the City of Hoquiam, the proposed action could increase safety risks due to train derailments and other kinds of rail incidents. These events pose a variety of risks to environmental health and safety, including potential injuries and fatalities for railroad staff and other individuals, loss and damage of property (both property belonging to the railroad and adjacent properties), environmental damage resulting from spills from train cars, loss of freight, and cleanup and wreck removal costs.

The possibility of train derailments is of particular concern in the area after two grain car derailments that occurred in Aberdeen in spring 2014. Although these incidents resulted in minimal costs besides the damage to the rail cars and loss of freight, they raised concern among area residents about the potential for damages if similar derailments occurred for rail shipments of crude oil. A report by the U.S. Congressional Research Service (2014) notes that there were 10 derailments of rail cars transporting crude oil in 2013 and 2014. As noted in Chapter 4, Section 4.4, *Environmental Health Risks—Rail Transport*, several additional train incidents have occurred in the first half of 2015. The damages associated with these derailments ranged from only relatively minimal losses of freight to a large explosion that resulted in 47 fatalities, extensive property damage, and evacuation of over 2,000 people in Quebec.

The costs that could be incurred by the City of Hoquiam from a train derailment or other kind of incident are unpredictable and depend on the probability of an incident occurring in a location that could affect city resources and the magnitude of damages if an incident were to occur. If a derailment or other kind of incident involving crude oil rail cars were to occur, the magnitude of damages is difficult to predict as the damages would depend on a variety of factors, including the severity of the incident (i.e., number of affected rail cars), the proximity of the incident to people and property, and the proximity of the incident to sensitive environments, among others.

As discussed in Chapter 4, *Environmental Health and Safety*, regulatory standards are or will soon be in place that will require the implementation and maintenance of emergency preparedness and response protocols intended to mitigate adequately the risks related to the proposed action. Although the overall risk of a large-scale event with the potential to result in broader damage is relatively low, the consequences of such an event would be significant. Therefore, the mitigation described in Chapter 4 is required to minimize these risks.

This mitigation includes the recommendation that the Hoquiam and Aberdeen Fire Departments be specifically trained to handle some of the safety risks associated with the proposed action. Although clean-up of environmental impacts of hazardous material release or oil spills is typically not the responsibility of local jurisdictions, local fire, police and medical services are typically first responders and have the responsibility of protecting the public from harm. Chapter 4,

Environmental Health and Safety, notes that the Hoquiam and Aberdeen Fire Departments have expressed a need for training at the project site (and along the PS&P rail line) to review and practice hazardous material release emergency responses. The Hoquiam and Aberdeen Fire Departments have an agreement in which they respond together to emergency calls.

Any training or equipment needed to better prepare local responders to handle the increased risk of oil spills or hazardous material releases would have a cost. The Hoquiam Fire Department is funded by the City of Hoquiam general funds and by fees for ambulance services. The main source of revenues for the City of Hoquiam general funds are property, sales and use, business and occupation, and utility taxes (City of Hoquiam 2012). Increased demands for training and equipment would require increases in local tax collections unless funded by other sources, such as a specific agreement with the applicant or through funding by public grants. There is currently not enough information on the extent of training or equipment needed to quantify these costs.

7.3.4.3 Potential Impacts on Property Values

Impacts on property values from the proposed action could result during construction and, to a larger extent, during operation of the proposed action. Impacts from these activities could affect property values by making surrounding properties less desirable as the result of impairing natural amenities such as air and water quality, increasing ambient noise levels and traffic congestion, and increasing risks that could adversely affect surrounding land uses (e.g., increased chance of incidents that could lead to hazardous materials releases and environmental damage).

Hedonic pricing is a method that uses data on real estate transactions to estimate the impact of various attributes on the values of nearby properties. It is commonly used to estimate the impacts of environmental amenities and other landscape features on property values. This method uses data on property values to estimate the value of an environmental amenity in terms of its effect on the values of nearby properties. More specifically, the hedonic pricing method uses statistical techniques to infer the value of a property attribute by comparing values of properties that have a given attribute and those that do not. Attributes evaluated in hedonic pricing studies can have either positive or negative impacts on property values.

Hedonic pricing is based on the assumption that individuals view goods such as houses as a bundle of attributes. In the case of houses, these attributes may include structural characteristics (e.g., size, number of bedrooms), neighborhood characteristics (e.g., crime rate, school quality, recreation opportunities), and environmental attributes (e.g., trees, proximity to open space, air quality, proximity to undesirable land uses). Individuals choose houses based on a combination of these attributes. Differences in the market price of houses can be used to derive an implicit value of each attribute. The implicit value of an attribute reflects what individuals, on average, are willing to pay for that attribute. The result of the hedonic pricing method is a function that relates the value of a property to a set of housing attributes, including the specific attribute being valued.

Although previous hedonic pricing studies suggest that there could be impacts on property values from construction and onsite operations of the proposed action, the impacts on property values that could be directly attributed to the proposed action are negligible. Because the project site is located in an already industrialized area, any negative impacts on nearby properties from construction or onsite operations would already have been realized and would not be a result of the proposed action.

Therefore, the potential for the proposed action to affect property values would occur primarily as the result of the perception of increased risk of impacts that could occur during transport. To evaluate the potential for these impacts, a literature review was conducted of other studies that have estimated the impacts of rail lines on property values. The studies, and their estimated impact of freight rail lines on property values, are summarized in Table 7-11.

Table 7-11. Summary of Studies Estimating the Impacts of Freight Rail Lines on Nearby Property Values

Authors and Publication Year	Study Title	Description of Rail Line Impact	Estimated Impact per Property	Distance Factor
Futch, M. (2011)	*Examining the Spatial Distribution of Externalities: Freight Rail Traffic and Home Values in Los Angeles*	Large increase in rail traffic along the Alameda Corridor, leading from the Ports of Los Angeles and Long Beach, California	Average per-property decrease in value of $3,500	Impact dissipates with distance, and is strongest for properties within 0.33 mile, less significant for properties within 0.66 mile of the rail line. Impact is not significant for properties greater than 0.66 miles from the rail line.
Simons, R.A. and A. El Jaouhari (2004)	*The Effect of Freight Railroad Tracks and Train Activity on Residential Property Values*	Increase in freight rail traffic on existing rail lines in Cuyahoga County, Ohio	Average decrease in value between $3,800 and $5,800. Impact increases with each additional train trip	Impact estimated for properties within 750 feet of the rail line.
The Eastman Company (2012)	*Increased Coal Train Traffic and Real Estate Values*	Large increases (between 9 and 18 daily trips) resulting from proposed Gateway Pacific Terminal at Cherry Point Washington	Decreases in property values between 5 and 20% for increases of 18 train trips per day. Decreases in property values between 3 and 5% for increases of 9 trips per day	Study focused on properties within 600 feet of the rail line, but suggests that impacts also would be experienced by properties further out from this zone.

From this review, it can be seen that proximity to freight rail lines can affect property values, and this impact increases with increasing rail traffic. These studies also show that the impact of rail lines on property values dissipates with distance. The most severe impacts are for properties within roughly 1,000 feet of the rail line and become negligible at distances of roughly 0.66 mile from the rail line.

To evaluate the potential for impacts on property values in Hoquiam, geographic information system (GIS) data were analyzed to determine the number of properties close to the rail line. As shown in Table 7-12, this analysis resulted in a count of the number of properties within given distance bands of 0 to 0.33 mile (1,760 feet), 0.33 to 0.66 mile (3,520 feet), and 0.66 mile to 1 mile (5,280 feet). As shown in the table, only a small number of properties within the boundaries of

Hoquiam are located close to the rail lines and could possibly experience property value impacts from the proposed action.

Table 7-12. Properties in Hoquiam Potentially Affected by Rail Traffic—Proposed Action

Distance from Rail Line	Number of Residential Properties
0 to 0.33 mile (1,760 feet)	7
0.33 mile to 0.66 mile (3,520 feet)	25
0.66 mile to 1 mile (5,280 feet)	33

Although other studies have shown an impact on the values of nearby properties from increases in freight rail traffic, it is not possible to use these studies as a basis for quantifying the impact of the proposed action on potentially affected properties in Hoquiam. The studies by The Eastman Company (2012) and Simons and El Jaouhari (2004), for example, only estimate impacts for properties less than 1,000 feet from the rail line, and no residential properties in Hoquiam are that close to the rail line. Futch (2011) estimated impacts on property values that were significant up to 0.66 mile from the rail line, meaning that 32 (7 plus 25) residential properties within the city boundary could experience property value impacts. It is difficult, however, to use the results of the Futch study to determine an impact for affected properties in Hoquiam, as the property value impacts estimated in the Futch study were for a very large increase in rail traffic. In contrast, the increase in rail traffic from the proposed action would be much smaller. The property value impacts from increased rail traffic due to the proposed action would thus likely be much smaller than the impacts estimated by these studies, which involved much larger increases in rail traffic.

7.3.5 What are the likely costs and benefits of the proposed action?

In summary, implementation of the proposed action would result in some economic and financial benefits to Hoquiam as well as some costs. Table 7-13 summarizes the main benefits and costs from the proposed action. When enough information was available, monetary estimates are provided in 2013 dollars.

Additionally, if additional projects, such as the Westway Terminal Company LLC project or Grays Harbor Rail Terminal Expansion Projects are implemented, the potential for more significant impacts on rail congestion, vehicle congestion, and the related safety concerns would also increase. The potential cumulative impacts related to these topics are discussed in Chapter 6, *Cumulative Impacts*.

Table 7-13. Main Benefits and Cost to the City of Hoquiam—Proposed Action (2013 Dollars)

Benefits	Quantification
Employment and Income	
Direct labor income (including benefits) during construction	Estimate: $3.1 million to $3.6 million
Annual direct labor income (including benefits) during each year of operations	Estimate: $260,000 to $325,000 per year
Additional labor income (including benefits) associated with indirect and induced jobs in during construction and operations	Not estimated
Fiscal Revenues	
Property tax collections during construction	Estimate: $120,428
Property tax collections during each year of operations	Estimate: $1.0 million per year
Additional tax collections during construction and operations from local sales and use tax, business and occupation tax and utility taxes	Not estimated
Costs	
Vehicle Traffic and Safety	
Increased traffic delays	Previous studies estimate: $9.66 and $16.18 per person delayed in traffic, per hour, for local traffic $16.51 and $24.76 per person delayed in traffic, per hour, for intercity traffic
Increased exposure to traffic accidents risks	Previous studies estimate: $3,037 per person to $1.5 million per person involved in a traffic accident, depending on severity of incident
Environmental Health and Safety	
Cost of training for the City of Hoquiam Fire Department on flammable liquid fires risks and to review and practice material release emergency response	Not estimated
Property Values	
Potential decrease in property values	Previous studies estimate: $3,500 to $5,800 on average 3% to 5% for increases of 9 trips per day 5% to 20% for increases of 18 trips per day

Chapter 8
Distribution List

19th District—Representatives
19th District—Senator
24th District—Representatives
24th District—Senator
32nd District—Representative
36th District—Representatives
36th District—Senator
38th District—Senator
46th District—Representatives
Aberdeen, City Council
Aberdeen, Community Development Department
Anacortes, City Council
Association of Washington Businesses
Bellingham, City Council
Capitol Land Trust
Centralia Stream Team
Centralia, City Manager
Chehalis Basin Partnership
Confederated Tribes of the Chehalis Reservation
Chehalis Land Trust
Chehalis River Council
Chehalis, Community Development Department
Citizens for a Clean Harbor
Clark County, Fire and Rescue
Climate Solutions
Coalition of Coastal Fisheries
Coeur d'Alene Tribe
Coastal Dungeness Crab Advisory Board
Columbia River Gorge Commission
Columbia River Inter-Tribal Fish Commission
Columbia Riverkeeper
Cosmopolis
Ecology SEPA Register
Elma, City Council
Forest Ethics
Friends of Grays Harbor
Friends of San Juans
Friends of the Columbia Gorge
Grays Harbor Audubon
Grays Harbor Chamber of Commerce
Grays Harbor Council of Governments
Grays Harbor County Division of Emergency Management *and* Grays Harbor Local Emergency Planning Committee
Grays Harbor County, Planning Division
Grays Harbor Economic Development Council
Grays Harbor Marine Resources Committee
Grays Harbor National Wildlife Refuge
Grays Harbor, Office of County Commissioners
Greater Grays Harbor, Inc.
Hood River, City Council
Hoquiam, City Council
Hoquiam Development Association
Imperium Terminal
Jefferson County, Board of Commissioners
Lewis County Emergency Management, Local Emergency Planning Committee
McCleary, City of
Montesano, City Council
Montesano, Community Development Department
National Park Service
Nature Conservancy
NOAA National Marine Fisheries Service
North Pacific Coast Marine Resources Committee
Northwest Indian Fisheries Commission
Oakville, City Hall
Ocean Shores, City Council
Ocean Shores, Planning Department
Olympia, City Council
Olympia, Port Commission
Olympic Coast National Marine Sanctuary
Olympic Region Clean Air Agency (ORCAA)
Port of Grays Harbor
Quinault Indian Nation
RE Sources for Sustainable Communities

Ridgefield, City of
Safe Energy Leadership Alliance
Seattle, City Council
Shoalwater Bay Tribe
Sierra Club
Spokane Lands Council
Spokane Riverkeeper
Spokane Tribe
Spokane, City Council
Surfrider Association
Timberland Regional Library System

- Aberdeen and Hoquiam in Grays Harbor County
- Centralia in Lewis County
- Olympia and Lacey in Thurston County

U.S. Army Corps of Engineers
U.S. Fish and Wildlife Service
U.S. Coast Guard Sector Columbia River
Vancouver, City Council
Vancouver, City Manager
Washington Coastal Marine Advisory Council
Washington Department of Archaeology and Historic Preservation (DAHP)
Washington Department of Fish and Wildlife (WDFW)
Washington Department of Natural Resources (DNR)
Washington Emergency Management Division (WEMD)
Washington Energy Facility Site Evaluation Council (EFSEC)
Washington Environmental Council
Washington Public Ports Association
Washington State Council of Firefighters
Washington State Department of Transportation (WSDOT)
Washington Utilities and Transportation Commission (UTC)
Washougal, City of
Westport, City of
Westway Terminal
Willapa Grays Harbor Oyster Growers Association
Yakama Nation

Chapter 9
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9.1 Section 3.1 Earth

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